

Civil Action 5:18-CV-00541-EEF-MLH

TELLIS ET. AL.

Plaintiff

v.

LEBLANC ET. AL.

Defendants

ANALYSIS OF ATTORNEY'S FEES

July 22, 2025

Prepared By:

Michele Avery, CPA/ABV, CVA, MAFF



CRI ADVISORS, LLC

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July 22, 2025

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Re: *Anthony Tellis and Bruce Charles, on behalf of himself and all other similarly situated prisoners at David Wade Correctional Center and The Advocacy Center v. James M. LeBlanc, et. al.*

1. Overview

I have been engaged by the Louisiana Office of Risk Management to review certain records and documents pertaining to the litigation “Tellis, et. al. v. LeBlanc, et. al.” (“Tellis Litigation”) and render an analysis with respect to the following issue:

- Attorneys’ fees being claimed by the Plaintiffs.

This report is to be used solely for the purposes of the above-referenced litigation and is not to be used for any purpose unrelated to this matter without the prior written approval of CRI Advisors, LLC (“CRI Advisors”). The use of the terms “I”, “we”, “our”, or “my” in this report, in the context of procedures, research, and analysis, refers to work performed by both me and staff working under my supervision and direction. The following sections set forth my qualifications as an expert, my conclusions, the documents considered, the basis for my conclusions, and disclosure of compensation.

I reserve the right to amend, modify, or supplement this report based upon receipt of new or additional information. Our services were performed in accordance with the Statement on Standards for Forensic Services established by the American Institute of Certified Public Accountants.

2. Qualifications

I am a Partner in Business Valuation and Forensic Accounting at CRI Advisors. I am a Certified Public Accountant (“CPA”), Accredited in Business Valuation (“ABV”), and Master Analyst in Financial Forensics (“MAFF”).

I have testified numerous times in damage cases, business valuations, and accounting matters. I have authored publications on business valuation and have taught continuing education courses to CPAs and attorneys on business valuations, forensic accounting, and other accounting matters.

The opinions and analyses contained in this report are based upon my knowledge, experience and training as a CPA, ABV, and MAFF. The methodologies that I have employed in undertaking my analysis are generally accepted in these fields.

My opinions are accounting, financial, and economic opinions. I have no opinion regarding the legal liability of any party in this matter and my calculations should not be construed to establish liability on the part of any party.

I am being compensated for my services at an hourly rate of \$300. My curriculum vitae is provided in Appendix A.

Neither CRI Advisors nor my compensation is in any way contingent on the outcome of this litigation.

3. Documents Considered

In connection with my analysis expressed herein, the documents I relied on are included in **Appendix B** of this report.

4. Background Understanding

The following summary is not intended to be a comprehensive history of the dispute, nor is it intended to represent any conclusion of fact or law relevant to this case.

Prisoners at the David Wade Correctional Center (“DWCC”) were allegedly subjected to cruel and debilitating conditions due to extensive lockdowns and solitary confinement.¹ Prisoner rights groups initiated an investigation into DWCC sometime in 2016. On February 20, 2018, the MacArthur Justice Center and Disability Rights Louisiana (“DRLA”) filed a federal lawsuit in the U.S. District Court for the Western District of Louisiana on behalf of two inmates, Anthony Tellis and Bruce Charles, against DWCC, the Louisiana Department of Corrections, and certain employees in their official capacities for allegedly violating the prisoners’ rights under the American with Disabilities Act, Rehabilitation Act and 42 U.S.C. 1983.

On September 20, 2021, the Court granted Plaintiffs’ motion for class certification, certifying as the class DWCC prisoners who will be placed or were in extended lockdown. A 16-day bench trial was held between January 10, 2022, to February 3, 2022. On November 1, 2022, Judge Elizabeth Foote ruled that the DWCC had violated the rights of prisoners.² A second bench trial to determine remedies DWCC had to take to redress the constitutionally deficient conditions began on January 17, 2023, and ended on or around February 6, 2023, lasting approximately 14 days. On July 18, 2024, Judge Foote ordered federal oversight for DWCC.³

The Tellis Litigation has spanned a period of seven years. The litigation has included numerous motions, a prolonged Discovery period and two bench trials.

¹ ACLU, *Tellis v. Leblanc*.

² “Mental health care at David Wade Correctional Center ruled unconstitutional,” *The Lens*, November 1, 2022.

³ “Torturous: Judge places solitary confinement and mental health care at David Wade prison under federal oversight,” *The Lens*, July 24, 2024.

On August 17, 2024, the Plaintiffs filed a Motion for an Award of Attorneys' Fees and Costs ("Motion for Attorneys Fees"). On June 30, 2025 Plaintiffs filed a Supplemental Motion for an Award of Attorneys' Fees and Cost ("Supplemental Motion").

Presented in Table 1 is a list of attorneys and their associated law firms and organizations that are making claims for attorney fees and costs.

Table 1

Name	Organization
Melanie Bray	DRLA
J. Dalton Courson	DRLA
Jonathan Trunnell	DRLA
Emma Douglas	DRLA
Sarah Voigt	DRLA
Ronald Lospennato	DRLA
Emily Mueller	DRLA
Leah O'Brien	DRLA
Kellie "Plum" Birk	DRLA
Katie Schwartzmann	ACLU
Bruce Hamilton	ACLU
Robert Cobbs	Cohen Milstein
Jamila Johnson (PJI)	Promise of Justice Initiative ("PJI")
Elena Malik (PJI)	Promise of Justice Initiative ("PJI")
Rebecca Ramaswamy (PJI)	Promise of Justice Initiative ("PJI")
Nishi Kumar (PJI)	Promise of Justice Initiative ("PJI")
Samantha Baslavage (PJI)	Promise of Justice Initiative ("PJI")
John N. Adcock	John Adcock Law, LLC

Time, fees and expenses requested by the Plaintiffs are as follows.

Table 2

	Requested		
	<u>Time</u>	<u>Fees</u>	<u>Expenses</u>
Motion for Attorneys Fees (Aug. 2024)	21,475.15	6,489,807.30	539,707.23
Supplemental Motion (Jun. 2025)	558.45	99,847.00	2,923.18
Total	22,033.60	\$ 6,589,654.30	\$542,630.41

The Plaintiffs' attached declarations to their Motion for Attorneys' Fees and Supplemental Motion. The declarations include detailed daily time entries ("Detailed Time Sheets") to support their requested hours and fees. Plaintiffs submitted a total of 13,783 detailed time entries that spanned the period of January 2016 through June 2025. These entries reflect 24,168.70 raw hours. Plaintiffs are requesting an award of 22,033.6 of these raw hours.

5. Keying Findings

In the course of my work, I reviewed the Detailed Time Sheets, various filings and motions pertaining to the Tellis Litigation, media coverage of the Tellis Litigation, and the Plaintiffs' Motion for Attorneys' Fees and Supplemental Motion.

5.1. Plaintiff tables of hours and fees sought contain mathematical errors and conflicting data points.

Table A in Plaintiffs' Motion for Attorney's Fees is presented below.

Table A: Requested Hours

Attorney	Raw Hours ²	Reductions	Total Hours Sought
Melanie Bray (DRLA)	6,006.05	265.4	5,740.65
J. Dalton Courson (DRLA)	1,212.5	40	1,172.5
Jonathan Trunnell (DRLA)	6,698.4	1,674.6	5,023.8
Emma Douglas (DRLA)	2,208.8	161.15	2,047.65
Sarah Voigt (DRLA)	336.5	84.12	252.38
Ronald Lospennato (DRLA)	593.45	42.5	550.95
Emily Mueller (DRLA)	945.7	36.7	909
Katie Schwartzmann	2622	-	2622
Bruce Hamilton (ACLU)	552.52	118.505	434.015
Robert Cobbs (Cohen Milstein)	162.25	-	162.25
Jamila Johnson (PJI)	102.44	-	102.44
Elena Malik (PJI)	162.43	40.25	122
Rebecca Ramaswamy (PJI)	36.7	9.9	26.8
Nishi Kumar (PJI)	290	63.2	226.8
Samantha Baslavage (PJI)	175	41	134
Legal Assistants	2029.55	146	1883.54
TOTAL	24,198.49	2,723.34	21,474.97

Table A includes mathematical errors that result in overstating total hours sought by 64.19 hours. A corrected version of Table A is presented below.

Table 3

Attorney	Raw Hours	Reductions	Hours Sought
Melanie Bray (DRLA)	6,006.05	265.40	5,740.65
J. Dalton Courson (DRLA)	1,212.50	40.00	1,172.50
Jonathan Trunnell (DRLA)	6,698.40	1,674.60	5,023.80
Emma Douglas (DRLA)	2,208.80	161.15	2,047.65
Sarah Voigt (DRLA)	336.50	84.12	252.38
Ronald Lospennato (DRLA)	593.45	42.50	550.95
Emily Mueller (DRLA)	945.70	36.70	909.00
Katie Schwartzmann	2,622.00	-	2,622.00
Bruce Hamilton (ACLU)	552.52	118.505	434.015
Robert Cobbs (Cohen Milstein)	162.25	-	162.25
Jamila Johnson (PJI)	102.44	-	102.44
Elena Malik (PJI)	162.43	40.25	122.00
Rebecca Ramaswamy (PJI)	36.70	9.90	26.80
Nishi Kumar (PJI)	290.00	63.20	226.80
Samantha Baslavage (PJI)	175.00	41.00	134.00
Legal Assistants	2,029.55	146.00	1,883.54
Total - CRI's Calculation	24,134.29	2,723.33	21,410.78
*Actual Totals in Plaintiffs' Motion	24,198.49	2,723.34	21,474.97
Differences	(64.20)	(0.02)	(64.19)

In Plaintiff's Table C, the Plaintiffs presented a higher number of hours for Melanie Bray (5,804.85) than was included in Table A (5,740.65). Furthermore, Plaintiffs transposed the hours sought for Ronald Lospennato and Emily Mueller in Table C. Detailed Time Sheets reflect that Emily Mueller sought 909 hours and Ronald Lospennato sought 550.95 hours. Correcting these errors reduces Plaintiffs' fees sought by \$81,918.75. This calculation is presented in Table 4.

Table 4

<u>Attorney</u>	<u>Hourly Rates</u>	<u>Total Hours Sought</u>		<u>Total Fees Sought</u>	
		<u>Table C as Presented</u>	<u>Corrected Table C</u>	<u>Table C as Presented</u>	<u>Corrected Table C</u>
Melanie Bray (DRLA)	300	5,804.85	5,740.65	\$ 1,741,455	\$ 1,722,195
J. Dalton Courson (DRLA)	400	1,172.50	1,172.50	469,000	469,000
Jonathan Trunnell (DRLA)	300	5,023.80	5,023.80	1,507,140	1,507,140
Emma Douglas (DRLA)	250	2,047.65	2,047.65	511,913	511,913
Sarah Voigt (DRLA)	400	252.38	252.38	100,952	100,952
Ronald Lospennato (DRLA)	400	909.00	550.95	363,600	220,380
Emily Mueller (DRLA)	225	550.95	909.00	123,964	204,525
Katie Schwartzmann	400	2,622.00	2,622.00	1,048,800	1,048,800
Bruce Hamilton (ACLU)	400	434.02	434.02	173,606	173,606
Robert Cobbs (Cohen Milstein)	400	162.25	162.25	64,900	64,900
Jamila Johnson (PJI)	400	102.44	102.44	40,976	40,976
Elena Malik (PJI)	250	122.00	122.00	30,500	30,500
Rebecca Ramaswamy (PJI)	300	26.80	26.80	8,040	8,040
Nishi Kumar (PJI)	300	226.80	226.80	68,040	68,040
Samantha Baslavage (PJI)	250	134.00	134.00	33,500	33,500
Legal Assistants	108	1,883.54	1,883.54	203,422	203,422
Total		21,474.98	21,410.78	\$6,489,808	\$ 6,407,889

Difference

\$ 81,918.75

There are also inconsistencies in total hours sought as presented in Plaintiffs' Tables C and F. Table C presents hours sought of 21,474.98. Table F presents hours sought of 21,475.15.

5.2. Plaintiffs' Detailed Time Sheets do not support total hours being sought.

Plaintiffs did not adjust their Detailed Time Sheets to reflect all the reductions in raw hours included in their total hours requested as reflected in Table F of the Plaintiffs' Supplemental Motion. The Detailed Time Sheets reflect total hours sought of 24,168.70. This compares to 22,033.60 presented in Table F. Plaintiffs' failure to provide Detailed Time Sheets to support their hours sought prevents a complete analysis of the appropriateness of the hours sought.

5.3. Billings in half-hour increments.

Approximately 41% of total fees requested by the Plaintiffs were billed in half-hour increments.

Plaintiffs' Detailed Time Sheets include 3,793 time entries in half-hour increments. This reflects 27.5% of all detailed entries. These entries comprise 9,248 of requested hours and \$2,777,349 of requested fees. These entries are presented in Exhibit 1.

5.4. Block billing

Plaintiffs' Detailed Time Sheets include 39 time entries that reflect block billing. A block billing entry is a time entry that includes multiple tasks, recorded by the timekeeper in one entry as a single block of time. These entries comprise 107.91 of requested hours and \$33,805.40 of requested fees. These entries are presented in Exhibit 2.

5.5. Incomplete time entries

The Plaintiffs' Detailed Time Sheets include 176 entries wherein the descriptions were cut off in mid-sentence. Consequently, it cannot be determined what these time entries were related to. These entries include 169.44 of requested hours and \$67,706 of requested fees. These entries are presented in Exhibit 3.

5.6. Vague time entries

Plaintiffs' Detailed Time Sheets include 199 entries that did not specify what was being worked on. Examples of these entries include 'meeting', "emails", "emailing team", etc. These entries comprise 166.4 of requested hours and \$54,722 of requested fees. These entries are presented in Exhibit 4.

5.7. Time entries in excess of ten hours.

Plaintiffs' Detailed Time Sheets include 964.63 entries that are in excess of ten hours. Attorney Trunnel recorded 20 time entries in excess of 10 hours, Bray recorded 15 time entries in excess of 10 hours and Douglas recorded 14 time entries in excess of ten hours. A summary of these entries is presented in Table 5.

Table 5

Time Entries Over Ten Hours			
<u>Attorney</u>	<u># of</u> <u>Entries</u>	<u>Requested</u>	
		<u>Hours</u>	<u>Fees</u>
Dalton Courson	10	117.50	\$ 47,000.00
E. Douglas	14	162.40	40,600.00
E. Mueller	6	68.60	15,435.00
J. Trunnell	20	249.50	74,850.00
Katie Schwartzmann	8	108.38	43,352.00
M. Bray	15	180.70	54,210.00
P. Birk	3	34.30	3,704.40
Robert Cobbs	1	10.25	3,587.50
Sarah Hall (Voigt)	3	33.00	13,200.00
Total		<u>964.63</u>	<u>\$ 295,938.90</u>

Attorney Schwartzmann entered a time entry of 21 hours on July 12, 2021, and a time entry of 17.00 hours on July 11, 2021. That would be 38 hours working in a 48-hour period. These entries comprise 964.63 of requested hours and \$295,938.90 of requested fees. These entries are presented in Exhibit 5.

5.8. Nishi Kumar time entries

Plaintiffs are seeking 226.8 hours valued at \$68,040 for work completed by attorney Nishi Kumar. Kumar's detailed time entries do not provide dates for which she worked. Additionally, 83.8% of Kumar's time is entered in one-hour increments, 14.7% in half-hour increments, and 1.5% in quarter hour increments. These entries are presented in Exhibit 6.

5.9. Fees by category

Presented below is a summary breakdown of requested fees by various categories. As can be seen in the schedule, approximately 14.22% (\$936,847) of requested fees are for work on Depositions, 8.10% for trial (\$534,056), 6.42% (\$423,080) for trial preparation, 6.39% (\$420,871) for Discovery and 7.84% (\$516,860) for DWCC Visits.

Table 6

Description	Fees	% of Total
Pre- Complaint Investigation	375,632.00	5.70%
Complaint	170,336.00	2.58%
Preliminary Injunction	106,490.00	1.62%
TRO	91,080.00	1.38%
Discovery	420,871.40	6.39%
Depositions	936,874.53	14.22%
Trial Preparation	423,080.10	6.42%
Trial	534,056.68	8.10%
Team Meetings	299,512.77	4.55%
Working - Experts	231,089.25	3.51%
DWCC Visits	516,860.35	7.84%
Case Management	223,297.20	3.39%
DWCC Doc Review	358,479.50	5.44%
Motions in Limine	163,403.00	2.48%
Motion for Summary Judgement	165,535.00	2.51%
Motion to Compel	113,617.00	1.72%
Motion for Class Certification	132,899.50	2.02%
Motion for Protective Order	94,539.00	1.43%
Motion for Attorney Fees	72,905.80	1.11%
Post Trial Briefs	190,410.20	2.89%
Various Other Motions	159,393.60	2.42%
Inmate Letters/Intake Letters/Inmate Response Letters	178,318.80	2.71%
Research	108,747.00	1.65%
Mediation	28,000.00	0.42%
Mass Mailings/Client Communications	160,763.70	2.44%
Other	901,892.23	13.69%
Reductions ¹	(567,303.32)	-8.61%
Total	\$ 6,590,781.30	100.02%

[1] - Plaintiffs detailed time entries were not adjusted to reflect all reductions in requested time.

A more detailed version of Table 5 with explanations for each category is presented in Exhibit 7.

5.10. Plaintiffs are requesting fees for trials of \$534,056.

The Tellis Litigation included two trials: a liability trial and a remedy trial. Plaintiffs are requesting fees of \$386,416 for the liability trial. Nine attorneys worked on the liability trial and are requesting fees. A breakdown of requested hours and time by attorney for the liability trial is presented below.

Table 7

Liability Trial		
<u>Attorney</u>	<u>Time</u>	<u>Fee</u>
E. Douglas	237	\$ 59,275.00
Elena Malik	90	22,441.67
J. Trunnell	226	67,650.00
Jamila Johnson	53	21,000.00
Katie Schwartzmann	237	94,840.00
M. Bray	321	96,360.00
R. Lospennato	0.3	120.00
Rebecca Ramaswamy	8	2,400.00
Samantha Bosalavage	89	22,374.51
Total	1,260.96	\$ 386,461.18

Plaintiffs are requesting fees of \$97,795 for the remedy trial. Four attorneys and one paralegal worked on the remedy trial and are requesting fees. A breakdown of requested hours and fees by attorney for the remedy trial is presented below.

Table 8

Remedy Trial		
<u>Attorney</u>	<u>Time</u>	<u>Fee</u>
Dalton Courson	132.00	\$ 52,800.00
E. Mueller	8.70	1,957.50
M. Bray	102.80	30,840.00
P. Birk	108.50	11,718.00
R. Lospennato	1.20	480.00
Total	353.20	\$ 97,796

Nishi Kumar is requesting fees of \$49,800 for 166 hours spent at trial. Kumar did not provide dates or descriptions in her time entries as to which trial she participated in.

5.11. Plaintiffs are requesting fees for depositions of \$936,874.

Thirteen Plaintiff attorneys participated in preparing for, traveling to, attending, taking and defending depositions. A breakdown of requested hours and fees per attorney is presented below.

Table 9

Depositions		
Attorney	Time	Fee
Bruce Hamilton	60.58	\$ 24,232.00
Dalton Courson	232.10	92,840.00
E. Douglas	237.00	59,250.00
E. Mueller	4.00	900.00
Elena Malik	18.50	4,625.00
J. Trunnell	940.90	282,270.00
Katie Schwartzmann	429.41	171,764.00
M. Bray	798.20	239,460.00
Nishi Kumar	16.50	4,950.00
P. Birk	2.90	313.20
R. Lospennato	125.80	50,320.00
Rebecca Ramaswamy	8.17	2,449.99
Samantha Bosalavage	14.00	3,500.35
Total	2,888.06	\$ 936,874.54

5.12. Duplicative work on motions and case filings.

Between five and nine attorneys worked on each of the Tellis Litigation's major motions and pleadings. A detail of requested hours and fees by attorney by motion or pleading is presented in Exhibit 8. A summary is presented in Table 9.

Table10

Motion/Pleading	# of Attorneys	Time	Fee
Complaint and Amended Complaints	5	532.64	170,336
Findings of Facts and Conclusion of Law	5	435.50	121,885
Motion for Class Certification	9	167.75	132,900
Motion for Summary Judgement	5	543.70	165,535
Motions in Limine	7	517.77	163,403
Motions to Compel	7	362.28	113,617
Preliminary Injunction	6	319.90	106,490
Total		2,879.54	\$ 974,166

7. Summary Conclusions – Adjustment to Requested Fees

In Table 10 the fees requested by the Plaintiffs' are adjusted for the factors identified in Section 5 of this report. These adjustments reduce the requested fees to \$3,542,503.

Table 11

Adjustment To Requested Fees	
Total Fees Claimed	\$ 6,589,654
Less:	
Mathematical error	81,919
Nishi Kumar	68,040
[1] Half-hour increments	2,691,699
[2] Block billing	17,568
[3] Incomplete time entries	34,706
[4] Vague time entries	35,336
[5] Ten hour plus entries	117,884
Adjusted Fee	<u>\$ 3,542,503</u>

Notes:

- [1] Excluded Nishi Kumar hours to avoid double counting.
- [2] Excluded half-hour increments to avoid double counting.
- [3] Excluded half-hour increments to avoid double counting.
- [4] Excluded Nishi Kumar hours and half hour increments to avoid double counting.
- [5] Excluded half-hour increments to avoid double counting.

7/22/2025

Date

Michele Avery

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EXHIBIT 1

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	8/21/17	0.5	0.5	Discussed upcoming David Wade trip with Sarah and the possibility of driving back on Tuesday after we complete the visits	DWCC Visits - Preparation	300	150
M. Bray	8/25/17	2	2	Began reading memos and other individual information in preparation for upcoming visit	DWCC Visits - Preparation	300	600
M. Bray	8/26/17	1	1	Review of individual memos and other documents	DWCC Visits - Preparation	300	300
M. Bray	8/27/17	6	6	Drove from New Orleans to Minden to the hotel	DWCC Visits - Travel	300	1800
M. Bray	8/28/17	1	1	Drove from the hotel to David Wade. Discussed the visits for the day on the ride	DWCC Visits - Travel	300	300
M. Bray	8/28/17	6	6	Walked through N4 and briefly spoke with individuals there. Then met with individual inmates.	DWCC Visits	300	1800
M. Bray	8/28/17	2	2	Drove from David Wade back to the hotel, debriefing meeting at the hotel	DWCC Visits - Debrief	300	600
M. Bray	8/29/17	1	1	Drove from hotel to David Wade; reviewed history of interviewees for the day in the car	DWCC Visits - Preparation	300	300
M. Bray	8/29/17	7	7	Met with and interviewed inmates	DWCC Visits	300	2100
M. Bray	8/29/17	6	6	Drove from David Wade back to New Orleans	DWCC Visits - Travel	300	1800
M. Bray	9/12/17	2	2	Drove from Mansfield to Homer	DWCC Visits - Travel	300	600
M. Bray	9/12/17	2	2	Arrived at DWCC, met with 3 individuals.	DWCC Visits	300	600
M. Bray	9/12/17	6	6	Drove from DWCC back to New Orleans	DWCC Visits - Travel	300	1800
M. Bray	9/13/17	0.5	0.5	Spoke with Jonathan about what happened at DWCC yesterday	DWCC Visits - Debrief	300	150
M. Bray	9/17/17	3	3	Review of Client's records from DWCC, created a spreadsheet with all the info	DWCC Doc Review	300	900
M. Bray	9/20/17	0.5	0.5	Spoke with family member re: Client. Anticipate a fax on Client's behalf.	Client Communications - Relative	300	150
M. Bray	9/25/17	0.5	0.5	Read complaint drafted for DWCC	Complaint	300	150
M. Bray	10/2/17	0.5	0.5	Drafted letter to DWCC to request video footage from the yard re CT and emailed to the team	Evidence Spoliation	300	150
M. Bray	10/11/17	0.5	0.5	Wrote memo re. call with parent. Emailed to the team	Client Communications - Relative	300	150
M. Bray	10/15/17	5.5	5.5	Drove from New Orleans to Minden, checked into the hotel. Will visit DWCC tomorrow	DWCC Visits - Travel	300	1650
M. Bray	10/15/17	1	1	Reviewed memos for interviews tomorrow. Spoke with Jonathan to make sure I had complete list of all information I needed to obtain during all interviews	DWCC Visits - Preparation	300	300
M. Bray	10/16/17	1	1	Drove from Minden to DWCC in Homer	DWCC Visits - Travel	300	300
M. Bray	10/16/17	0.5	0.5	Went through security, got badges, drove to south compound	DWCC Visits	300	150
M. Bray	10/16/17	6	6	Interviews, walked the yard to see where the south compound goes to yard. Met with 6 people, debrief with Derenda	DWCC Visits	300	1800
M. Bray	10/16/17	4.5	4.5	Drafting DWCC memos and sent email to the team re. observations and my walk through the yard	DWCC Visit Memos	300	1350
M. Bray	10/17/17	3.5	3.5	Finished drafting DWCC Memos and emailed them to the group to read before the meeting tomorrow	DWCC Visit Memos	300	1050
M. Bray	10/23/17	0.5	0.5	Called GR, she called re. her husband at DWCC	Client Communications - Relative	300	150
M. Bray	10/27/17	0.5	0.5	Sent email to GR with ARP info and referral info for her husband with medical complaints at DWCC	Client Communications - Relative	300	150
M. Bray	11/8/17	1	1	DWCC Meeting	Case Management - Team Meeting	300	300
M. Bray	11/9/17	1	1	Editing complaint with Jonathan for the preservation order at DWCC	Complaint	300	300
M. Bray	11/12/17	5.5	5.5	Researching case law for TRO factors for DWCC	Legal Research	300	1650
M. Bray	11/13/17	1	1	Sending additional case law I found to Jon for the TRO	TRO	300	300
M. Bray	11/14/17	6.5	6.5	Picked up rental car and Jonathan, drove to Homer to meet IT guys to go to DWCC	DWCC Visits - Travel	300	1950
M. Bray	11/15/17	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300
M. Bray	11/15/17	2	2	Interviews with 4 inmates, Jon and I spoke with 2 people each	DWCC Visits	300	600
M. Bray	11/16/17	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300
M. Bray	11/16/17	0.5	0.5	Retrieved computer equipment from DWCC	Case Management - Administrative Tasks	300	150
M. Bray	11/16/17	6.5	6.5	Drove from DWCC back to New Orleans	DWCC Visits - Travel	300	1950
M. Bray	12/5/17	3.5	3.5	Reviewed and edited DWCC Complaint	Complaint	300	1050
M. Bray	12/6/17	3.5	3.5	Editing DWCC Complaint and adding facts about Plaintiffs	Complaint	300	1050
M. Bray	12/7/17	0.5	0.5	Reviewing spreadsheet of records for AT to add facts to complaint.	Complaint	300	150
M. Bray	12/7/17	0.5	0.5	Received list of dates of deleted video files for DWCC. Compared to request list. Replied to Katie's email	Evidence Spoliation	300	150
M. Bray	1/4/18	0.5	0.5	Spoke with Miranda about Angola and the transfer of inmates to DWCC	Angola	300	150
M. Bray	1/4/18	0.5	0.5	Spoke with Sarah about DWCC and the issues that arose during the visits yesterday. She spoke with Jon and Katie yesterday. We are going to try to set up a meeting tomorrow to discuss	Call/Discussion - Co-Counsel	300	150
M. Bray	1/10/18	2	2	DWCC Weekly Meeting	Case Management - Team Meeting	300	600
M. Bray	1/24/18	2	2	DWCC Weekly Meeting	Case Management - Team Meeting	300	600
M. Bray	1/25/18	1	1	Call with associate from SPLC with Jonathan and Ron re. DWCC	Case Management	300	300
M. Bray	1/31/18	0.5	0.5	Received TRO with edits from Ron for DWCC. Began review of edits and his comments	TRO	300	150
M. Bray	2/12/18	1	1	DWCC meeting to discuss last minute issues with the complaint	Complaint	300	300
M. Bray	2/14/18	0.5	0.5	Reviewed all Motions and Orders for DWCC to be sure all the captions are correct and the wording is also correct. Let Jon know I reviewed them all	Complaint	300	150
M. Bray	2/19/18	0.5	0.5	Met with DWCC team to discuss changes to the complaint and other documents	Complaint	300	150
M. Bray	2/19/18	2	2	Research for relation of claims for DWCC	Legal Research	300	600
M. Bray	2/19/18	1	1	DWCC Team meeting to discuss timeline of filing tomorrow for all the documents	Complaint	300	300
M. Bray	2/20/18	0.5	0.5	Discussed making DWCC complaint and access suit related with Ron, Sarah, Jon.	Complaint	300	150
M. Bray	2/20/18	1	1	Completed civil cover sheet for DWCC	Complaint	300	300
M. Bray	2/21/18	0.5	0.5	Review of all communications re. video requests to get timeline for TRO argument for DWCC	TRO	300	150
M. Bray	2/23/18	0.5	0.5	Creating more user friendly sheet with timeline for TRO argument for DWCC argument tomorrow	TRO Hearing - Preparation	300	150
M. Bray	2/28/18	1	1	Printed copies of the complaint and gathered everything we need to go for DWCC	DWCC Visits - Preparation	300	300
M. Bray	3/2/18	7	7	Drove from DWCC back to New Orleans	DWCC Visits - Travel	300	2100
M. Bray	3/5/18	0.5	0.5	Review of response to opposition to TRO for DWCC. Emailed edits and comments back to the team.	TRO	300	150
M. Bray	3/6/18	1	1	Drafted declaration of Matthew from Slate for DWCC. Emailed to Jon for review before sending it to Matthew for review	Affidavits	300	300
M. Bray	3/7/18	0.5	0.5	Tried to file return on summons for DWCC. Unable to change the answer due date.	Summons	300	150
M. Bray	3/9/18	0.5	0.5	Received motion to strike in DWCC. Read pleadings	Motion to Strike Affidavits	300	150
M. Bray	3/19/18	0.5	0.5	Watched video of TB Incident. Saved video to Dropbox. Scanned all affidavits from Jon and Unusual Occurrence Report for TB to Dropbox for DWCC	Evidentiary Issues - Security Camera Videos	300	150
M. Bray	3/20/18	1	1	Working on drafting opposition of motion to strike for DWCC	Motion to Strike Affidavits	300	300
M. Bray	3/20/18	0.5	0.5	Drafting visit memo for client CH - DWCC	DWCC Visits	300	150
M. Bray	3/20/18	0.5	0.5	Drafted visit memo for client TW - DWCC	DWCC Visit Memos	300	150

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	3/20/18	0.5	0.5	Drafted visit memo for client SG - DWCC	DWCC Visit Memos	300	150
M. Bray	3/21/18	0.5	0.5	Revising and editing Opposition to Mtn to Strike for DWCC	Motion to Strike Affidavits	300	150
M. Bray	3/27/18	0.5	0.5	Spoke with mother of client SG.	Client Communications - Relative	300	150
M. Bray	3/27/18	1	1	Reviewing and editing opposition to motion to strike for DWCC with Jon's edits	Motion to Strike Affidavits	300	300
M. Bray	3/28/18	1	1	DWCC Weekly Meeting	Case Management - Team Meeting	300	300
M. Bray	3/29/18	0.5	0.5	Discussed DWCC memo with Jon, finalized edits and saved as PDF. Filed in MDLA	DWCC Visit Memos	300	150
M. Bray	4/2/18	0.5	0.5	Reviewed DWCC documents to determine how we can/should supplement to provide the video to the court	Motion to Supplement	300	150
M. Bray	4/2/18	0.5	0.5	Spoke with grandmother of client MC.	Client Communications - Relative	300	150
M. Bray	4/4/18	2	2	Researched and drafted motion and memo to supplement the reply for DWCC	Motion to Supplement	300	600
M. Bray	4/11/18	0.5	0.5	Drafted Motion to File Conventionally for DWCC video from body camera	Evidentiary Issues - Security Camera Videos	300	150
M. Bray	4/16/18	0.5	0.5	Filed Supplemental Reply and Mtn to File Video Conventionally in MDLA for DWCC	Evidentiary Issues - Security Camera Videos	300	150
M. Bray	4/20/18	3	3	Gathering information for initial disclosures for DWCC	Initial Disclosures	300	900
M. Bray	4/25/18	0.5	0.5	Working on combining the TRO memo/motion to refile in WDLA for DWCC	TRO	300	150
M. Bray	4/26/18	1	1	Working on combining the TRO memo/motion to refile in WDLA for DWCC. Emailed to Sarah and Jon for review	TRO	300	300
M. Bray	4/30/18	0.5	0.5	Updated Motion to file conventionally for WDLA and order, emailed to Jonathan	Motion for Leave to File	300	150
M. Bray	4/30/18	0.5	0.5	Filed the preliminary injunction and motion to file conventionally in WDLA for DWCC	Preliminary Injunction	300	150
M. Bray	5/3/18	6.5	6.5	Drove from hotel in Minden to DWCC. Visits with prisoners.	DWCC Visits	300	1950
M. Bray	5/7/18	1	1	Watched Video #2 for JR at DWCC and made note of the start times. This video is the same as Video #1	Evidentiary Issues - Security Camera Videos	300	300
M. Bray	5/9/18	1	1	DWCC status conference	Status Conference	300	300
M. Bray	5/10/18	0.5	0.5	Received a call from clerk at WDLA, we need to send another copy of the video to the clerk's office. She walked me through the process and helped me find the form we need to send. I completed the form and gave it to Chelsea to FedEx a copy of the video - DWCC	Evidentiary Issues - Security Camera Videos	300	150
M. Bray	5/16/18	1	1	Working on filling in the initial disclosures for DWCC	Initial Disclosures	300	300
M. Bray	5/30/18	0.5	0.5	Meeting before conference call for DWCC	Status Conference - Preparation	300	150
M. Bray	6/1/18	2	2	Research for initial disclosures and working on document portion for DWCC	Initial Disclosures	300	600
M. Bray	6/4/18	1	1	Reviewing DRAFT RFP for DWCC. Reviewing Memo for class cert to outline what we need to provide to help narrow the RFP	RFP	300	300
M. Bray	6/5/18	1	1	Phone call with Jonathan and Sarah and the expert for DWCC Kathy Burns	Case Matters	300	300
M. Bray	6/5/18	0.5	0.5	Finished reviewing handheld video of JR incident from 10/7/17. Reviewed DWCC Policy 34 as well	Evidentiary Issues - Security Camera Videos	300	150
M. Bray	6/5/18	0.5	0.5	Edited DWCC RFP and emailed to group	RFP	300	150
M. Bray	6/5/18	0.5	0.5	Discussed DWCC with Jonathan and the points that came up during his call with Katie	Call/Discussion - Co-Counsel	300	150
M. Bray	6/12/18	1	1	DWCC meeting to discuss logistics for upcoming hearing	Preliminary Injunction	300	300
M. Bray	6/13/18	0.5	0.5	Meeting with Jon and Sarah re. division of labor for upcoming hearing and witnesses	Case Management - Staffing	300	150
M. Bray	6/19/18	1	1	DWCC planning for exhibits and coordinating the binders for the court. Discussed how to get evidence entered and through whom	Case Matters	300	300
M. Bray	6/20/18	0.5	0.5	Discussed directs with Jonathan.	Preliminary Injunction	300	150
M. Bray	6/20/18	1	1	Discussed DWCC and other issues with Jon and Sarah	Call/Discussion - Co-Counsel	300	300
M. Bray	6/21/18	5	5	Prep for DWCC PI hearing next week	Preliminary Injunction	300	1500
M. Bray	6/22/18	4	4	Moot and hearing prep with the DWCC team	Preliminary Injunction	300	1200
M. Bray	6/25/18	6	6	Picked up rental car from Enterprise. Drove from New Orleans to Minden to check into the hotel	DWCC Visits - Travel	300	1800
M. Bray	7/6/18	0.5	0.5	Called MC's grandmother, she needed our address again to send the documents she has. Sent an email to the team to recap what we talked about	Client Communications - Relative	300	150
M. Bray	7/11/18	0.5	0.5	Phone conference with Kathy Burns to discuss a sample of records for DWCC	Working with Experts	300	150
M. Bray	7/13/18	2	2	DWCC Weekly Meeting	Case Management - Team Meeting	300	600
M. Bray	7/16/18	0.5	0.5	Gathering info for DWCC for Ron to create the database	Database	300	150
M. Bray	7/20/18	5	5	Received First set of Interrogatories and RFP from Defendants in DWCC case. Reviewed the requests and researched obligations to provide responses	Discovery	300	1500
M. Bray	7/23/18	2	2	DWCC Meeting to discuss responses to first set of interrogatories and RFP	Discovery	300	600
M. Bray	7/23/18	0.5	0.5	Received a package from MC's grandmother with MC's records. Briefly viewed them, they are original documents. Gave them to Emily to scan into Dropbox so we can return the originals. Drafted cover letter to send with the documents	Case Management - Document Management	300	150
M. Bray	7/24/18	3.5	3.5	Researching for responses to Defense first discovery requests for DWCC in preparation for our meeting this afternoon	Discovery	300	1050
M. Bray	8/1/18	4.5	4.5	DWCC Strategy Meeting	Case Management - Team Meeting	300	1350
M. Bray	8/1/18	0.5	0.5	Received Initial Disclosures and First set of discovery responses re. Bushnell from Thomas Gayle. Saved to Dropbox and printed, reviewed responses.	Discovery	300	150
M. Bray	8/1/18	0.5	0.5	Read all emails and attachments re. DWCC while I was out	DWCC Doc Review	300	150
M. Bray	8/7/18	0.5	0.5	Read article about heat litigation in Texas prisons, as it relates to DWCC	Legal Research	300	150
M. Bray	8/8/18	0.5	0.5	Edited and revised the reply to Defendant's opposition brief post hearing for DWCC	Case Management	300	150
M. Bray	8/9/18	1	1	DWCC Weekly Meeting	Case Management - Team Meeting	300	300
M. Bray	8/9/18	1	1	Drafting Third set of interrogatories and RFP for DWCC	RFP	300	300
M. Bray	8/9/18	0.5	0.5	Reviewing RFA for DWCC	Request for Admissions	300	150
M. Bray	8/9/18	0.5	0.5	Discussed DWCC tasks and Filemaker requests for DWCC with Ron and Jon	Case Management - Document Management	300	150
M. Bray	8/10/18	0.5	0.5	Revised the request to supplement RFP for DWCC and finalized. Sent back out to the team to be put on dual letterhead and sent to Jon to email to opposing counsel	RFP	300	150
M. Bray	8/10/18	1	1	Met with Jon and Chelsea to discuss DWCC. Edited the latest set of interrogatories and RFP, added one more request and sent back out to the team for review	Discovery	300	300
M. Bray	8/15/18	0.5	0.5	Discussion with Jon and Katie about what needs to be done for DWCC	Case Management - Planning	300	150
M. Bray	8/15/18	0.5	0.5	Conference call with Dr. Burns and the DWCC team to discuss the upcoming visit	DWCC Visits - Preparation	300	150

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	8/16/18	0.5	0.5	Reviewed motion for leave to reply for DWCC. Sent an email to the team for clarification, received a response, replied.	Motion for Leave to File Sur-reply	300	150
M. Bray	8/17/18	0.5	0.5	Received signed documents back from son for TH. Printed, scanned to Dropbox.	TH Death Investigation	300	150
M. Bray	8/22/18	1	1	Drafted Motion and Proposed Order for HIPAA for DWCC. Revised Memo. Sent back out to the team for review.	Motion for Protective Order	300	300
M. Bray	8/23/18	0.5	0.5	Received decision from court on protective order for DWCC. Saved to Dropbox and reviewed with Jon	Motion for Protective Order	300	150
M. Bray	8/23/18	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	8/24/18	0.5	0.5	Read report and recommendation regarding the preliminary injunction for DWCC	Preliminary Injunction	300	150
M. Bray	8/24/18	0.5	0.5	Drafted Fourth Interrogatory for DWCC. Created two versions, one with all defendants on one form and the other separate documents for each Defendant. Emailed to the team for their opinion as to which form is better	Discovery	300	150
M. Bray	8/27/18	3.5	3.5	Working on completing the responses for Interrogatories and RFP for DWCC	Discovery	300	1050
M. Bray	8/28/18	3	3	Working on completing the responses for Interrogatories and RFP for DWCC	Discovery	300	900
M. Bray	8/28/18	0.5	0.5	Received and analyzed an email from Connell, opposing counsel for DWCC, with a preservation and production request for the notebooks for all persons including experts and attorneys that did the cell front interviews.	Discovery of Expert Notes	300	150
M. Bray	8/29/18	1	1	Researched and drafted beginning of memo re. discovery of the expert notes and the factual basis prisoners were selected for private interviews for DWCC	Discovery of Expert Notes	300	300
M. Bray	8/29/18	0.5	0.5	Researching discovery for experts for DWCC	Discovery	300	150
M. Bray	8/29/18	1	1	Working on completing the responses for Interrogatories and RFP for DWCC. Sent drafts around to the team for review	Discovery	300	300
M. Bray	8/29/18	0.5	0.5	Discussed with Chelsea and Emily the information needing to be gathered for the RFP for DWCC.	RFP	300	150
M. Bray	8/30/18	2	2	DWCC weekly meeting	Case Management - Team Meeting	300	600
M. Bray	8/31/18	2	2	Reviewing draft of objections to the report and recommendation for PI for DWCC	Preliminary Injunction	300	600
M. Bray	8/31/18	3	3	Working on responses for DWCC discovery	Discovery	300	900
M. Bray	8/31/18	4.5	4.5	Work on compiling responses for discovery for DWCC, reviewing 2nd production from Defendants, and working on response to their Int. 26 and RFP 18	Discovery	300	1350
M. Bray	9/4/18	2	2	Revised remainder of objection to recommendation and report sent by Sarah this morning. Sent edits to Jon for review	Objection to Report & Recommendations	300	600
M. Bray	9/6/18	0.5	0.5	Discussed discovery and Filemaker issues with Chelsea for DWCC	Discovery	300	150
M. Bray	9/6/18	1	1	Meeting for DWCC with the team to discuss some issues	Case Management - Team Meeting	300	300
M. Bray	9/10/18	1	1	Drafting motion and memo to transfer settlement agreement from MDLA to WDLA for DWCC	Motion to Transfer Settlement Agreement	300	300
M. Bray	9/12/18	1	1	Drafted second request to supplement the first discovery responses for DWCC.	Discovery	300	300
M. Bray	9/14/18	0.5	0.5	Received edits from Katie on the second request to supplement. Reviewed, made some comments, emailed back to team for further review	Discovery	300	150
M. Bray	9/19/18	1	1	Meeting with Jon and Katie to discuss discovery issues before the call at 2 for DWCC	Discovery	300	300
M. Bray	9/23/18	1	1	DWCC Doc Review	DWCC Doc Review	300	300
M. Bray	9/24/18	0.5	0.5	Drafted request and release for Claiborne Parish Coroner re. TH records. Faxed.	TH Death Investigation	300	150
M. Bray	9/24/18	2	2	Revised MISO compel discovery for DWCC	Motion to Compel	300	600
M. Bray	9/27/18	2	2	Working on completing the request to supplement for Defendants DWCC	Request to Supplement	300	600
M. Bray	9/27/18	0.5	0.5	Gathering research I had for expert notes to be turned over for DWCC to send to the team	Legal Research	300	150
M. Bray	10/2/18	4.5	4.5	Client visits at EHCC	EHCC Visits	300	1350
M. Bray	10/3/18	2	2	Updated list of witnesses from initial disclosures for the supplemental response for DWCC	Discovery	300	600
M. Bray	10/8/18	0.5	0.5	Reviewing Enforcement Memo from Sarah on the issue of enforcing the settlement agreement for DWCC	Settlement Agreement	300	150
M. Bray	10/17/18	3.5	3.5	Drafting opposition to Defendant's motion to compel re. notes from walkthrough with experts. Sent draft to Ron to review before I sent it out to the team	Motion to Compel	300	1050
M. Bray	10/22/18	0.5	0.5	Received draft of opposition from Jon for DWCC, reviewed. Discussed with Jon, revised, sent back out to team	Motion to Compel	300	150
M. Bray	10/26/18	1	1	Reviewing documents sent by Chris in preparation for meeting with Ed Aro on Monday re. DWCC litigation	Case Management	300	300
M. Bray	10/26/18	1	1	Reviewing documents sent by Chris in preparation for meeting with Ed Aro on Monday re. DWCC litigation	Case Management	300	300
M. Bray	10/30/18	3	3	Typed visit memos from EHCC visit on 10/2. Saved to individual folders and emailed to team.	EHCC Visits	300	900
M. Bray	10/30/18	0.5	0.5	Received an email from Jon re. responding to Keith about what we want to confer about for DWCC. Redrafted proposed response.	Correspondence - Co-Counsel	300	150
M. Bray	10/30/18	0.5	0.5	Discussed DWCC with Jon	Call/Discussion - Co-counsel	300	150
M. Bray	10/31/18	0.5	0.5	Drafted memo from visit with JG at EHCC and saved to Dropbox	EHCC Visits	300	150
M. Bray	10/31/18	1	1	Drafted Mtn for Leave to file excessive pages for opposition to compel and proposed order, emailed to team for DWCC. Also discussed memo opposing compel with team	Motion for Leave to Excess Pages	300	300
M. Bray	10/31/18	0.5	0.5	Drafted memo from visit with JG at EHCC and saved to Dropbox	EHCC Visits	300	150
M. Bray	10/31/18	0.5	0.5	Reformatting and editing the memo in opposition to compel for	Motion to Compel	300	150
M. Bray	11/2/18	0.5	0.5	Meet & Confer with Keith Fernandez re. discovery issues and things that are outstanding	Discovery	300	150
M. Bray	11/2/18	0.5	0.5	Received 3rd set of RFP Responses for DWCC. Saved to Dropbox and printed to review before the call this afternoon	RFP	300	150
M. Bray	11/2/18	2	2	DWCC Doc Review	DWCC Doc Review	300	600
M. Bray	11/5/18	0.5	0.5	Drafted Sixth RFP and Interrogatories for DWCC emailed to team	Discovery	300	150
M. Bray	11/6/18	1	1	Review of responses to Interrogatory Set #3 for DWCC. We will need to meet and confer re. supplementing those responses	Meet and Confer	300	300
M. Bray	11/9/18	3	3	DWCC Doc Review	DWCC Doc Review	300	900
M. Bray	11/14/18	0.5	0.5	Discussed upcoming DWCC trip with Jon	DWCC Visits - Preparation	300	150
M. Bray	11/14/18	0.5	0.5	Typed up memo from call with MMI re. client LG and saved to DWCC Dropbox	Case Matters	300	150
M. Bray	11/15/18	3	3	DWCC Team meeting at MacArthur	Case Management - Team Meeting	300	900
M. Bray	11/16/18	1	1	Scheduling conference call with Magistrate Judge for DWCC	Status Conference	300	300
M. Bray	11/18/18	7	7	Picked up rental car from Enterprise, got Jon and last minute things from the office, Drove to Minden for DWCC visits	DWCC Visits - Travel	300	2100
M. Bray	11/20/18	6	6	Drove from DWCC back to New Orleans	DWCC Visits - Travel	300	1800

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	11/20/18	7	7	DWCC visits	DWCC Visits	300	2100
M. Bray	11/28/18	2	2	Meeting with Sarah to discuss the trip to DWCC last week and some other outstanding issues to be discussed tomorrow	DWCC Visits	300	600
M. Bray	11/29/18	0.5	0.5	Reviewing intake letters for DWCC that we did not review at the meeting this morning	Intake Letters	300	150
M. Bray	11/30/18	1	1	Reviewed and edited MISO amending complaint. Drafted Motion for Leave to Amend and proposed order. Sent everything back out to DWCC team for further reviews	Complaint - Amended	300	300
M. Bray	11/30/18	0.5	0.5	Reviewing DWCC discovery responses for completeness	Discovery	300	150
M. Bray	11/30/18	1	1	Reviewing and editing Amended Complaint. Revised MISO and Motion for Leave. Sent everything back out to the DWCC team for	Complaint - Amended	300	300
M. Bray	11/30/18	0.5	0.5	Reviewing DWCC discovery responses for completeness	Discovery	300	150
M. Bray	12/5/18	3.5	3.5	Breaking out third part of fifth discovery production for DWCC	Discovery	300	1050
M. Bray	12/10/18	4.5	4.5	Doc Review DWCC	DWCC Doc Review	300	1350
M. Bray	12/16/18	6.5	6.5	Typing up visit memos from November visits for DWCC	DWCC Visits	300	1950
M. Bray	12/18/18	2	2	Review of intake letters for DWCC, review of past visit memos to prepare for visits tomorrow	Intake Letters	300	600
M. Bray	12/19/18	5.5	5.5	Drove from DWCC back to New Orleans	DWCC Visits	300	1650
M. Bray	12/19/18	1	1	Drove from hotel in Minden to DWCC	DWCC Visits	300	300
M. Bray	12/19/18	6.5	6.5	Client visits	DWCC Visits	300	1950
M. Bray	12/20/18	8	8	Drafted and revised reply to Defendant opposition to amend for DWCC. Began revising motion to compel to prepare for filing	Motion to Compel	300	2400
M. Bray	12/21/18	3.5	3.5	Finalized Motion to Compel and filed. Finalized Reply and filed for DWCC	Motion to Compel	300	1050
M. Bray	1/3/19	0.5	0.5	DWCC weekly meeting	Case Management - Team Meeting	300	150
M. Bray	1/7/19	0.5	0.5	Discussed reply to opposition to compel for DWCC with Jon. I will draft a reply	Motion to Compel	300	150
M. Bray	1/8/19	5	5	Drafting reply to opposition to Compel for DWCC. Sent to team for review	Motion to Compel	300	1500
M. Bray	1/10/19	0.5	0.5	Edits to reply to opposition for DWCC, incorporated Sarah's edits and sent to Ron for review	Motion to Compel	300	150
M. Bray	1/14/19	0.5	0.5	Discussed DWCC with Jon and upcoming trip	DWCC Visits - Preparation	300	150
M. Bray	1/15/19	0.5	0.5	Drafted contact memo from call with BS re. her son in extended at DWCC. Saved to Dropbox and put into weekly meeting folder	Client Communications - Relative	300	150
M. Bray	1/18/19	0.5	0.5	Discussed DWCC projects and research with Niles	Call/Discussion - Co-counsel	300	150
M. Bray	1/20/19	5	5	DWCC Doc Review	DWCC Doc Review	300	1500
M. Bray	1/22/19	7.5	7.5	Traveled from DWCC back to New Orleans	DWCC Visits - Travel	300	2250
M. Bray	1/23/19	0.5	0.5	Updated active visit sheet for DWCC with yesterday's visits and new people we need to speak with	DWCC Visits	300	150
M. Bray	1/23/19	2	2	Met with Katie and David Cloud re. DWCC and Vera	Case Management	300	600
M. Bray	1/26/19	7.5	7.5	DWCC Doc Review	DWCC Doc Review	300	2250
M. Bray	1/30/19	0.5	0.5	Drafted motion and order for TRO and PI on client access Discussed TRO for DWCC with Jon	TRO	300	150
M. Bray	1/31/19	0.5	0.5	Discussed DWCC with Jon, Katie, and Bruce	Call/Discussion - Co-counsel	300	150
M. Bray	2/1/19	0.5	0.5	Researching the motion & memo to intervene new plaintiffs for	Motion to Intervene	300	150
M. Bray	2/2/19	0.5	0.5	Reviewing MH policies as part of RFP 13 to incorporate into RFA and for depo prep for Robinson and Dauzat	Deposition - Preparation	300	150
M. Bray	2/4/19	0.5	0.5	Received Katie's edits to reply to opposition for TRO for DWCC and began revising	TRO	300	150
M. Bray	2/5/19	1	1	Meeting with Jon, Ron, Sarah to go over the argument for the TRO conference call tomorrow for DWCC	TRO	300	300
M. Bray	2/5/19	0.5	0.5	Updated discovery production spreadsheet for DWCC with 6th production info	Discovery	300	150
M. Bray	2/5/19	0.5	0.5	Discussed DWCC with Sarah	Call/Discussion - Co-counsel	300	150
M. Bray	2/5/19	2	2	DWCC Doc Review	DWCC Doc Review	300	600
M. Bray	2/6/19	1	1	DWCC Doc Review & depo prep	Deposition - Preparation	300	300
M. Bray	2/6/19	0.5	0.5	Pre-meeting before the TRO for DWCC to prep	TRO	300	150
M. Bray	2/11/19	0.5	0.5	Worked with Tory, the DWCC temp, to show him what we will need from him	Case Management - Staffing	300	150
M. Bray	2/11/19	0.5	0.5	Received Katie's edits on opposition to compel, reviewed my research on the subject of objecting to "any and all facts" for DWCC	Motion to Compel	300	150
M. Bray	2/13/19	2	2	Depo Prep for DWCC	Deposition - Preparation	300	600
M. Bray	2/14/19	0.5	0.5	DWCC Weekly meeting - discussing our positions for our call this afternoon with opposing counsel	Case Management - Team Meeting	300	150
M. Bray	2/14/19	0.5	0.5	Revising depo questions for Robinson for DWCC	Deposition - Preparation	300	150
M. Bray	2/14/19	1	1	Meet and Confer call with opposing counsel for DWCC	Meet and Confer	300	300
M. Bray	2/15/19	2	2	Received filings for DWCC, reviewed filings and saved to Dropbox	Case Management - Document Management	300	600
M. Bray	2/18/19	5	5	DWCC Depo Prep for Robinson	Deposition - Preparation	300	1500
M. Bray	2/18/19	0.5	0.5	Review of Jon's edits to the Opposition to Defendants' motion to compel for DWCC	Motion to Compel	300	150
M. Bray	2/19/19	7.5	7.5	Drove from New Orleans to Minden for DWCC depositions	Deposition - Travel	300	2250
M. Bray	2/20/19	1	1	Drove from hotel to DWCC for deposition of Robinson	Deposition - Travel	300	300
M. Bray	2/20/19	7.5	7.5	Robinson Deposition	Deposition	300	2250
M. Bray	2/21/19	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300
M. Bray	2/21/19	7.5	7.5	Dauzat Deposition	Deposition	300	2250
M. Bray	2/21/19	7	7	Drove from DWCC back to New Orleans	DWCC Visits - Travel	300	2100
M. Bray	2/22/19	0.5	0.5	Unloaded boxes from DWCC depositions back into the office, gave Chris an update on the depositions	Deposition - Preparation	300	150
M. Bray	3/6/19	2	2	Drafting AC Discovery responses for DWCC	Discovery	300	600
M. Bray	3/6/19	4	4	Drafting AC Discovery responses for DWCC	Discovery	300	1200
M. Bray	3/12/19	7.5	7.5	Drove from NOLA to Ruston for DWCC visits tomorrow	DWCC Visits - Travel	300	2250
M. Bray	3/13/19	15	15	Visits at DWCC and travel back to New Orleans	DWCC Visits - Travel	300	4500
M. Bray	3/15/19	0.5	0.5	Discussed DWCC with Sarah	Call/Discussion - Co-counsel	300	150
M. Bray	3/18/19	0.5	0.5	Letters for DWCC	Intake Letters	300	150
M. Bray	3/19/19	2	2	Drafting motion for leave to file third amended complaint for DWCC	Complaint - Third Amended	300	600
M. Bray	3/20/19	0.5	0.5	Sent notice of depositions for DWCC around to the team for	Deposition - Preparation	300	150
M. Bray	3/21/19	0.5	0.5	Revised supplemental memo for class cert for DWCC and sent to	Class Certification	300	150
M. Bray	3/23/19	8	8	Depo prep for Hayden for DWCC	Deposition - Preparation	300	2400
M. Bray	3/24/19	3.5	3.5	Depo prep for Hayden for DWCC	Deposition - Preparation	300	1050
M. Bray	3/25/19	0.5	0.5	Discussed response letters from DWCC mail so they can be mailed out with Angela and Jon.	Inmate Response Letters	300	150
M. Bray	3/26/19	6	6	Drove from New Orleans to Ruston for DWCC depositions this week	Deposition - Travel	300	1800
M. Bray	3/26/19	3	3	Review of Bruce Charles records with Jon to prepare for depo prep in the morning	Deposition - Preparation	300	900
M. Bray	3/27/19	3	3	Met with Bruce Charles for depo prep	Deposition - Preparation	300	900
M. Bray	3/27/19	1	1	Drove from hotel in Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	3/27/19	1	1	Drove from DWCC back to hotel	DWCC Visits - Travel	300	300
M. Bray	3/28/19	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300
M. Bray	3/28/19	1	1	Drove from DWCC back to hotel	DWCC Visits - Travel	300	300
M. Bray	3/28/19	4	4	Depo of Bruce Charles	Deposition	300	1200

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	3/28/19	5.5	5.5	Depo of Lonnie Nail	Deposition	300	1650
M. Bray	3/29/19	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300
M. Bray	3/29/19	7	7	Drove from DWCC back to New Orleans	DWCC Visits - Travel	300	2100
M. Bray	3/29/19	6	6	Depo of Steve Hayden	Deposition	300	1800
M. Bray	4/3/19	0.5	0.5	Review of responses to AC discovery for DWCC	Discovery	300	150
M. Bray	4/4/19	0.5	0.5	Saving docs to DWCC folder, organizing files in the folders	Case Management - Document Management	300	150
M. Bray	4/8/19	0.5	0.5	Review of weekly intake letters for DWCC to send responses	Intake Letters	300	150
M. Bray	4/9/19	3	3	Review of DWCC discovery to determine new requests and supplemental requests	Discovery	300	900
M. Bray	4/10/19	2	2	Reviewing DWCC weekly intake letters and drafting responses	Intake Letters	300	600
M. Bray	4/10/19	0.5	0.5	Reviewing DWCC discovery to determine new requests and drafting 8th set of RFPs	Discovery	300	150
M. Bray	4/11/19	1	1	Finished going through Defendant's answer to amended complaint adding AC and noting admissions and denials	Complaint - Amended	300	300
M. Bray	4/12/19	0.5	0.5	Double checked all response letters to DWCC intakes to be mailed today and made changes. Gave Angela the release form to be sent with a letter	Intake Letters	300	150
M. Bray	4/15/19	0.5	0.5	Review of court order for DWCC	Review - Court Order	300	150
M. Bray	4/15/19	0.5	0.5	Reviewed opposition to second motion to amend for DWCC and made notes	Motion to Amend	300	150
M. Bray	4/16/19	0.5	0.5	Talked to Katie about DH and DWCC	Call/Discussion - Co-counsel	300	150
M. Bray	4/18/19	0.5	0.5	Received a return call from Rebecca Cloud at Ruston Library re. DWCC mail	Case Management	300	150
M. Bray	4/20/19	1	1	DWCC Doc Review	DWCC Doc Review	300	300
M. Bray	4/22/19	0.5	0.5	Drafted call memo for JG and circulated to DWCC team	Call Memo	300	150
M. Bray	4/22/19	0.5	0.5	Listened to voicemails re. client BJ who is at DWCC. Tried to return her calls, left her a message. Later, spoke with partner re. BJ at DWCC. I explained to her who we are and what we are doing there and what we cannot help with.	Client Communications	300	150
M. Bray	4/23/19	1	1	Moving DWCC intake letters	Intake Letters	300	300
M. Bray	4/23/19	0.5	0.5	Discussed DWCC with Angela	Call/Discussion - Co-counsel	300	150
M. Bray	4/24/19	0.5	0.5	Received a voicemail from a friend of client JG, with some info about him. He hasn't showered or eaten in 2 days, they have him in an extended lockdown unit at EHCC. She gave me the name and number of his brother.	Client Communications - Relative	300	150
M. Bray	4/26/19	6	6	Drove to EHCC for visits, visits with 3 clients, drove back to New Orleans	EHCC Visits	300	1800
M. Bray	4/26/19	1	1	Prepared letters to be mailed for mass mailing to DWCC with Jon and Niles. Tory helped for a little bit as well.	Mass Mailing	300	300
M. Bray	4/26/19	0.5	0.5	Received 2 new letters from DWCC. Scanned and saved to Weekly Intake Folder	Intake Letters	300	150
M. Bray	4/29/19	0.5	0.5	Organized DWCC intake folder, moved old letters to individual folders	Intake Letters	300	150
M. Bray	4/29/19	0.5	0.5	Reviewing order from Judge Foote re. cameras after PI Hearing. Need to discuss with DWCC team to determine if it is necessary to reurge this issue	Review - Court Order	300	150
M. Bray	4/30/19	2	2	DWCC Doc Review	DWCC Doc Review	300	600
M. Bray	4/30/19	0.5	0.5	Discussed call with Judge with Angela to make sure she understood what the purpose was and what that means	Case Management - Planning	300	150
M. Bray	4/30/19	0.5	0.5	Discussion with DWCC team prior to scheduling call with Judge Hornsby	Preparation - Status Conference	300	150
M. Bray	5/1/19	1	1	Legal research re. other similar prison cases.	Legal Research	300	300
M. Bray	5/2/19	0.5	0.5	Revised responses to AC Discovery and emailed around to team for Jon to review for DWCC	Discovery	300	150
M. Bray	5/2/19	0.5	0.5	Discussed DWCC discovery responses requested from AC with Jon	Discovery	300	150
M. Bray	5/4/19	4	4	Breaking out Seventh Production for DWCC and saving all responses to Dropbox	Discovery	300	1200
M. Bray	5/6/19	0.5	0.5	Printed copies of second amended complaint, DH's letters, and all Defendants responses to prepare for this trip	DWCC Visits - Preparation	300	150
M. Bray	5/7/19	1	1	Retrieved video of handheld cameras from June 2017 to December 2017 with Warden Goodwin	DWCC Visits	300	300
M. Bray	5/8/19	4.5	4.5	Visits at DWCC	DWCC Visits	300	1350
M. Bray	5/8/19	6.5	6.5	Drove back to New Orleans	DWCC Visits - Travel	300	1950
M. Bray	5/9/19	0.5	0.5	Scanned all docs given by clients during visits at DWCC to Dropbox	DWCC Visits	300	150
M. Bray	5/10/19	0.5	0.5	Drafting visit memos from DWCC visits	DWCC Visit Memos	300	150
M. Bray	5/10/19	0.5	0.5	Drafting visit memos from DWCC visits	DWCC Visit Memos	300	150
M. Bray	5/11/19	0.5	0.5	Read through responses to RFP 7 again from DWCC	Request for Production	300	150
M. Bray	5/13/19	0.5	0.5	Reviewed Motion to Dismiss Henry for DWCC	Motion to Dismiss Henry	300	150
M. Bray	5/14/19	0.5	0.5	Revised motion to dismiss Henry for DWCC and emailed to team for ACLU review	Motion to Dismiss Henry	300	150
M. Bray	5/16/19	0.5	0.5	Drafted records request for client RH to get records from UMC. Emailed to DWCC team for review before I fax it over	Client Matters	300	150
M. Bray	5/16/19	0.5	0.5	DWCC Doc Review	DWCC Doc Review	300	150
M. Bray	5/17/19	1	1	Updated 8th set of discovery requests and sent around to the team for review for DWCC	Discovery	300	300
M. Bray	5/20/19	0.5	0.5	Revising 8th Set of Discovery for DWCC	Discovery	300	150
M. Bray	5/20/19	0.5	0.5	Revising 8th Set of Discovery for DWCC. Sent to team for review	Discovery	300	150
M. Bray	5/22/19	0.5	0.5	Finalized letter to GoDepo with corrections to Hayden transcript and emailed to GoDepo and opposing counsel	Deposition - Transcripts	300	150
M. Bray	5/25/19	3.5	3.5	Drafting responses to Second set of discovery propounded to AC for DWCC. Sent around to team for review	Discovery	300	1050
M. Bray	5/28/19	1	1	Further researching and drafting motion to preserve tier footage for DWCC	Motion to Preserve	300	300
M. Bray	5/29/19	2	2	Drafting motion to preserve tier footage for DWCC	Motion to Preserve	300	600
M. Bray	5/31/19	0.5	0.5	Drafted motion to expedite and sent around to DWCC team	Motion to Expedite	300	150
M. Bray	5/31/19	4.5	4.5	Breaking out files for DWCC Doc Review	Case Management - Document Management	300	1350
M. Bray	6/13/19	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	6/18/19	0.5	0.5	Discussed DWCC with Jon, he filled me in on the call they had with the security expert	Working with Experts	300	150
M. Bray	6/20/19	0.5	0.5	Spoke with the CO P&A about their case. I will send him a copy of our complaint for DWCC and he will send us their settlement	Vague	300	150
M. Bray	6/24/19	1	1	Review of DWCC discovery stuff and drafted a proposed response email to Keith	Discovery	300	300
M. Bray	6/27/19	2	2	DWCC Doc Review	DWCC Doc Review	300	600
M. Bray	7/2/19	2	2	Finished drafting additional information the court said to provide for DWCC and sent to the team for review	Case Management	300	600
M. Bray	7/2/19	1	1	Discussed DWCC with Angela	Call/Discussion - Co-counsel	300	300
M. Bray	7/3/19	1	1	Read emails re. the list of people for discovery for DWCC, revised and updated the list and sent it back around to the team for review	Discovery	300	300
M. Bray	7/3/19	1	1	Finalized list for DWCC to be sent to opposing counsel with Jon. Finalized and emailed around a proposed visit list for 7/15	DWCC Visits	300	300

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	7/5/19	0.5	0.5	Review of intake letters for DWCC	Intake Letters	300	150
M. Bray	7/16/19	0.5	0.5	Received records for client RH from UMC from Jon. Saved the records from the disc to Dropbox and reviewed, there are only a few pages of records	Client Matters	300	150
M. Bray	7/17/19	0.5	0.5	Discussed the DH issue with the team via email. Called mother with Jenna present	Client Communications - Relative	300	150
M. Bray	7/19/19	0.5	0.5	Reviewed DWCC intake letter responses	Intake Letters	300	150
M. Bray	7/24/19	2	2	Printing documents for DWCC trip and gathering everything we need	DWCC Visits	300	600
M. Bray	7/24/19	4	4	Drove from Hammond to Ruston for DWCC visits starting tomorrow	DWCC Visits - Travel	300	1200
M. Bray	7/25/19	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300
M. Bray	7/25/19	1	1	Drove from DWCC back to Ruston	DWCC Visits - Travel	300	300
M. Bray	7/26/19	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300
M. Bray	7/26/19	5.5	5.5	Visits on South Compound	DWCC Visits	300	1650
M. Bray	7/26/19	1	1	Drove from DWCC to Ruston for food	DWCC Visits - Travel	300	300
M. Bray	7/26/19	5.5	5.5	Drove from Ruston to New Orleans	DWCC Visits - Travel	300	1650
M. Bray	7/29/19	0.5	0.5	Entered hours and expenses from DWCC trip	Time Sheets	300	150
M. Bray	7/29/19	0.5	0.5	Called father obo client CD at DWCC.	Client Communications - Relative	300	150
M. Bray	7/29/19	0.5	0.5	DWCC Doc Review	DWCC Doc Review	300	150
M. Bray	7/30/19	1	1	Review of memos drafted by Jessica from DWCC trip	DWCC Visits	300	300
M. Bray	7/31/19	0.5	0.5	Drafted list of individuals to be visited at EHCC. Discussed the list with Jon, I will circulate it to the team and contact Tara Dennis to see what day we can set this up for	EHCC Visits	300	150
M. Bray	8/8/19	4.5	4.5	DWCC Doc Review	DWCC Doc Review	300	1350
M. Bray	8/9/19	3.5	3.5	Client visits at EHCC	EHCC Visits	300	1050
M. Bray	8/12/19	1	1	Training temporary people for DWCC and setting them up on the computers	Case Management - Staffing	300	300
M. Bray	8/12/19	1	1	DWCC Doc Review	DWCC Doc Review	300	300
M. Bray	8/14/19	0.5	0.5	Quick review of DWCC Intake letters, there are no memos or responses available yet, but I read through a few letters	Intake Letters	300	150
M. Bray	8/15/19	1	1	Updated RFP sheet for DWCC to include everything received to date	Request for Production	300	300
M. Bray	8/26/19	0.5	0.5	Scanned weekly intake letters for DWCC	Intake Letters	300	150
M. Bray	8/26/19	0.5	0.5	Scanning death reports received from Claiborne Parish Coroner as result of PRA for DWCC	Public Record Requests	300	150
M. Bray	8/26/19	1	1	Saved all death reports scanned into discovery folder for DWCC	Discovery	300	300
M. Bray	8/27/19	0.5	0.5	Drafting response letters to DWCC intakes	Intake Letters	300	150
M. Bray	8/28/19	0.5	0.5	Drafted a quick reference for DWCC activities for Jamie and emailed to her	Case Management	300	150
M. Bray	8/30/19	2	2	Researching and drafting opposition to Def Motion for mental exams	Motion for Mental Exams	300	600
M. Bray	9/4/19	0.5	0.5	Client RB wrote that he wants us to return an original document to him. Looked through Dropbox as well as they physical letters, unable to locate the original document he's requesting. Will ask him about it on Friday when we meet with him.	Vague	300	150
M. Bray	9/4/19	4	4	Sorting out issues with the DWCC temps and having access to files. There is an issue with Filemaker, brought it to Ron's attention he is going to get it fixed. Ensured that they all have work to do until we return from Monroe next week	Case Management - Technology Issues	300	1200
M. Bray	9/5/19	0.5	0.5	Discussion with Jon and the interns about the settlement and other DWCC matters	Settlement Agreement	300	150
M. Bray	9/5/19	5.5	5.5	Drove from New Orleans to Minden	DWCC Visits - Travel	300	1650
M. Bray	9/6/19	0.5	0.5	Went through security, arrived on S. Compound for client visits	DWCC Visits	300	150
M. Bray	9/6/19	6.5	6.5	Visits with clients	DWCC Visits	300	1950
M. Bray	9/9/19	0.5	0.5	Traveled to Court to meet with Judge Hayes, set up in the courtroom awaiting everyone else's arrival	Mediation - Travel	300	150
M. Bray	9/9/19	1	1	Mediation with Judge Hayes	Mediation	300	300
M. Bray	9/9/19	6.5	6.5	Drove back to New Orleans	Mediation - Travel	300	1950
M. Bray	9/13/19	0.5	0.5	Reviewed Jon's revisions to opposition for mental exam, will send to Bruce when I'm done	Motion for Mental Exams	300	150
M. Bray	9/13/19	0.5	0.5	Discussion with DWCC temps to check in on progress and	Case Management - Staffing	300	150
M. Bray	9/13/19	0.5	0.5	Call with Dan Pacholke to discuss what he needs before the walkthrough and what he needs to review in general. I will send a Dropbox link with all items and send the printed versions via Fed Ex	DWCC Visits - Preparation	300	150
M. Bray	9/16/19	1	1	Meeting with Jon to prepare for the meet and confer call re. DWCC discovery issues	Discovery	300	300
M. Bray	9/17/19	0.5	0.5	Review of all responses to discovery requests for DWCC, located the offer for them to inspect.	Discovery	300	150
M. Bray	9/17/19	1	1	Drafting motion for contempt for DWCC	Motion for Contempt	300	300
M. Bray	9/18/19	0.5	0.5	Status conference call with Magistrate Judge Hornsby to discuss scheduling and outstanding issues. We will submit a motion to fix the fact range by October 2	Status Conference	300	150
M. Bray	9/18/19	0.5	0.5	Checked in with the DWCC temps and let them know we are having a meeting tomorrow and they should have an idea of what they've done and what they have left. Discussed a few issues that came up	Case Management - Staffing	300	150
M. Bray	9/18/19	2	2	Researching and drafting motion for contempt, sent to team for review and edits	Motion for Contempt	300	600
M. Bray	9/19/19	0.5	0.5	Discussed DWCC with Katie and Jon	Call/Discussion - Co-counsel	300	150
M. Bray	9/25/19	2	2	Adding files to Dan Pacholke's folder so we can get it off to him. Copying the files is taking a long time	Working with Experts	300	600
M. Bray	9/26/19	0.5	0.5	Met with DWCC temporary help to assist with some issues and make sure everyone is comfortable with their projects	Case Management - Staffing	300	150
M. Bray	9/26/19	0.5	0.5	Discussion with Katie and Jon re. discovery and what needs to be done	Discovery	300	150
M. Bray	9/27/19	0.5	0.5	Call with Katie and Jon to discuss DWCC discovery and where we are with reviewing	Discovery	300	150
M. Bray	9/27/19	2	2	DWCC Doc Review	DWCC Doc Review	300	600
M. Bray	10/1/19	1	1	DWCC Doc Review	DWCC Doc Review	300	300
M. Bray	10/3/19	2	2	DWCC Weekly meeting at ACLU office	Case Management - Team Meeting	300	600
M. Bray	10/10/19	0.5	0.5	Scanned letters in for DWCC for Jamie since the scanning is not working and the Dropbox is having issues. I will email the letters around for everyone to review with the memos and responses.	Client Letters	300	150
M. Bray	10/10/19	0.5	0.5	Finalized Set 9 of DWCC discovery and sent to team for review	Discovery	300	150
M. Bray	10/17/19	0.5	0.5	DWCC weekly meeting.	Case Management - Team Meeting	300	150
M. Bray	10/18/19	3	3	Client visits at EHCC	EHCC Visits	300	900
M. Bray	10/21/19	2	2	Added N1 and N2D rosters to EL list for DWCC. Formatted and sorted by last name, printed 8 copies. Formatted and sorted by location and printed 8 copies. Getting packets together for everyone on the walkthrough	Case Management	300	600
M. Bray	10/22/19	0.5	0.5	Went to Enterprise to pick up the rental car, they do not have a van ready for me to pick up they are getting one from another location. I will leave and come back	DWCC Visits - Travel	300	150
M. Bray	10/22/19	6.5	6.5	Drove from New Orleans to Ruston for the expert visit at DWCC	DWCC Visits - Travel	300	1950

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	10/23/19	1	1	Drove from hotel in Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	10/24/19	1	1	Drove from hotel in Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	10/25/19	1	1	Drove from Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	10/25/19	7.5	7.5	Accompanied experts in meeting with clients.	Working with Experts	300	2250
M. Bray	10/25/19	7.5	7.5	Drove from DWCC back to New Orleans, the travel home was much slower due to bad weather for nearly the entire drive	DWCC Visits - Travel	300	2250
M. Bray	11/6/19	4	4	Reviewing intake letters for DWCC	Intake Letters	300	1200
M. Bray	11/13/19	1	1	Reviewing Motion for Contempt, the key, and creating exhibits. Sent an email back around to the team with my edits	Motion for Contempt	300	300
M. Bray	11/14/19	0.5	0.5	Prepared for video hearing with Judge Foote for DWCC	Motion for Mental Exams	300	150
M. Bray	11/19/19	4.5	4.5	DWCC depo prep, finding court reporter, drafting Mtn Withdraw Sarah, reviewing notice of depositions	Deposition - Preparation	300	1350
M. Bray	11/22/19	0.5	0.5	Updated discovery list with indications as to what has been broken out and what is in Filemaker to include the Ninth production. Emailed the team	Discovery	300	150
M. Bray	11/22/19	0.5	0.5	Review of mail policies for DWCC	Intake Letters	300	150
M. Bray	11/26/19	0.5	0.5	Sent Leah instructions for the depo defense printing project, discussed with her how we will put that all together	Deposition - Preparation	300	150
M. Bray	11/27/19	3.5	3.5	Meet and confer phonecall with Keith re. DWCC and AC's responses to discovery that they determined were deficient	Meet and Confer	300	1050
M. Bray	11/30/19	0.5	0.5	Printing documents for depositions and gathering all materials needed for the next 2 weeks of depositions for DWCC	Deposition - Preparation	300	150
M. Bray	12/1/19	0.5	0.5	Picked up rental car from Enterprise on Baronne and drove back to load all items for DWCC trip from the office.	DWCC Visits - Travel	300	150
M. Bray	12/1/19	5.5	5.5	Drove from New Orleans to Ruston	DWCC Visits - Travel	300	1650
M. Bray	12/1/19	1	1	Review of records before meetings tomorrow for depo prep	Deposition - Preparation	300	300
M. Bray	12/2/19	1	1	Drove from Ruston to DWCC for client meetings	DWCC Visits - Travel	300	300
M. Bray	12/2/19	6.5	6.5	Met with a total of 8 people. Three are on the North side, we will meet with them tomorrow. We were told by Mays that we needed to leave by 5 despite Randy Robert telling us we could stay until 6. He said they have roll at 5:45 and then intake after that.	DWCC Visits	300	1950
M. Bray	12/2/19	1	1	Drove from DWCC back to Ruston	DWCC Visits - Travel	300	300
M. Bray	12/3/19	1	1	Drove from Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	12/3/19	0.5	0.5	Went through security and came to South Compound	DWCC Visits - Travel	300	150
M. Bray	12/3/19	1	1	Drove from DWCC to Ruston	DWCC Visits - Travel	300	300
M. Bray	12/4/19	1	1	Drove from Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	12/4/19	7	7	Defended depositions	Deposition	300	2100
M. Bray	12/6/19	1	1	Drove from DWCC back to Ruston	DWCC Visits - Travel	300	300
M. Bray	12/7/19	3.5	3.5	Preparing for depositions next week	Deposition - Preparation	300	1050
M. Bray	12/9/19	1	1	Drove from Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	12/9/19	0.5	0.5	Went through security and set up for the deposition of James Burgos	Deposition	300	150
M. Bray	12/10/19	1	1	Drove from Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	12/10/19	0.5	0.5	Went through security and set up for the deposition of Angie Huff	Deposition	300	150
M. Bray	12/11/19	1	1	Drove from Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	12/11/19	0.5	0.5	Went through security and set up for the deposition of Kayla Sherman	Deposition	300	150
M. Bray	12/12/19	1	1	Drove from Ruston to DWCC	DWCC Visits - Travel	300	300
M. Bray	12/12/19	0.5	0.5	Went through security and set up for the deposition of Paul Pitts	Deposition	300	150
M. Bray	12/13/19	5.5	5.5	Drove from Ruston back to New Orleans	DWCC Visits - Travel	300	1650
M. Bray	12/13/19	1	1	Dropped off Katie, unloaded all boxes at the office, returned rental car to Enterprise	Block Billing	300	300
M. Bray	12/16/19	2	2	Drafting 10th set of discovery requests for DWCC to circulate to the team. Emailed to the team for review and additions	Discovery	300	600
M. Bray	12/18/19	0.5	0.5	Continuing downloading and saving links with supplemental discovery for DWCC. Breaking files into smaller chunks and tracking in the spreadsheets what we have received and when	Discovery	300	150
M. Bray	12/19/19	4	4	Working on opposition to 4th Motion to Compel for DWCC	Motion to Compel	300	1200
M. Bray	12/23/19	0.5	0.5	Received an email from Randy that they are agreeable to extend discovery to March 15. I updated the proposed joint motion with the continued dates and sent around to the DWCC team to review so it could be sent to Randy for approval then filed	Discovery	300	150
M. Bray	12/23/19	0.5	0.5	Updating google docs for discovery for DWCC to keep track of what we have, compared to original requests to determine what we are still missing	Discovery	300	150
M. Bray	12/23/19	0.5	0.5	Spoke with Emma and discussed DWCC to do and priorities	Discovery	300	150
M. Bray	12/23/19	0.5	0.5	Working on supplemental responses to discovery for DWCC	Discovery	300	150
M. Bray	12/23/19	1	1	Working on supplemental responses to discovery for DWCC.	Discovery	300	300
M. Bray	12/23/19	3	3	Working on supplemental responses to discovery for DWCC	Discovery	300	900
M. Bray	1/1/20	6	6	Drove from New Orleans to Ruston for DWCC depositions	DWCC Visits	300	1800
M. Bray	1/2/20	8	8	Depo prep with 6 people on south compound for DWCC	Deposition - Preparation	300	2400
M. Bray	1/2/20	1	1	Drove from DWCC back to Ruston	DWCC Visits	300	300
M. Bray	1/3/20	1	1	Drove from Ruston to DWCC	DWCC Visits	300	300
M. Bray	1/3/20	3	3	Depo prep with people on North Compound, began with 3 from N5 protective custody. Had to wait to bring in anyone from general population until the N5 guys were gone because cannot have the guys in the same room	Deposition - Preparation	300	900
M. Bray	1/3/20	2	2	Depo prep for guys back on South Compound, was able to meet with 2 people before we had to leave at 4. They gave us a 15 minute warning, they were serious about making sure we were gone by 4	Deposition - Preparation	300	600
M. Bray	1/3/20	1	1	Drove from DWCC back to Ruston	DWCC Visits	300	300
M. Bray	1/6/20	1	1	Drove from Ruston to DWCC for depo prep	DWCC Visits	300	300
M. Bray	1/6/20	0.5	0.5	Began reviewing notes from depo prep to print and organize for depositions beginning tomorrow	Deposition - Preparation	300	150
M. Bray	1/7/20	1	1	Drove from Ruston to DWCC for depositions	DWCC Visits	300	300
M. Bray	1/7/20	1	1	Drove from DWCC to Ruston	DWCC Visits	300	300
M. Bray	1/8/20	1	1	Drove from Ruston to DWCC for depositions	DWCC Visits	300	300
M. Bray	1/8/20	6	6	Depos at DWCC	Deposition	300	1800
M. Bray	1/9/20	1	1	Drove from Ruston to DWCC for depositions	DWCC Visits	300	300
M. Bray	1/10/20	1	1	Drove from Ruston to DWCC for depositions	DWCC Visits	300	300
M. Bray	1/10/20	1	1	Reviewed the supplemental brief for class cert re. mootness for DWCC, added TOC/TOA and sent back around to the team	Class Certification	300	300
M. Bray	1/12/20	8	8	Revising our responses to Defendants' RFAs for DWCC. Revising their responses to our RFAs to incorporate some of the language from the objections they used.	Request for Admissions	300	2400
M. Bray	1/12/20	0.5	0.5	Reviewed the filings replying to the 30(b)(6) Mtn to compel, the 4th Mtn Compel, and the objection to appeal the interrogatory decision. If responses are necessary, I will work on them tomorrow	Motion to Compel	300	150
M. Bray	1/13/20	0.5	0.5	Reviewed Bruce's edits and comments on the responses to Defendants' RFAs for DWCC. Made some changes and sent back around to the team for further review	Request for Admissions	300	150

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	1/13/20	0.5	0.5	Received a discovery link from Defendants for DWCC. Downloaded the link and accessed the documents, but determined that it is the same production as the 6th supplement to the 8th production. There are no new files in the link	Discovery	300	150
M. Bray	1/14/20	1	1	Drove from Ruston to DWCC	DWCC Visits	300	300
M. Bray	1/14/20	1	1	Went through security and waited for the fog count to be completed so I could be escorted to the South Compound to conduct the read and signs	DWCC Visits	300	300
M. Bray	1/14/20	1	1	Drove from DWCC back to Ruston	DWCC Visits	300	300
M. Bray	1/14/20	1	1	Reviewed Defendants' reply to the motion to compel 30(b)(6) and discussed with Katie and Jon. Called Ron to discuss, Katie will draft the initial draft then send around for review. Ron to review tomorrow	Motion to Compel	300	300
M. Bray	1/15/20	0.5	0.5	Drafted reply to Def opposition to the appeal for additional interrogatories. It is due to be filed today, will circulate when I have access to Wifi for review by the team	Discovery	300	150
M. Bray	1/17/20	6	6	Drove from Ruston back to New Orleans	DWCC Visits	300	1800
M. Bray	1/22/20	0.5	0.5	Discussion of DWCC matters with Jon and Katie. Discussed planning and scheduling depositions, expert needs. Emailed Defendants asking if they will accept service of the SDT for Nail and the rolodex	Deposition	300	150
M. Bray	1/24/20	1	1	Drafting motion to compel for 8th and 9th sets of discovery for the responses that Defendants have stated they will not produce responses for	Motion to Compel	300	300
M. Bray	1/27/20	0.5	0.5	Drafting MISO Mtn to Compel discovery 8th & 9th set issues for DWCC	Motion to Compel	300	150
M. Bray	1/28/20	0.5	0.5	Copied all depositions into a dropbox folder for the experts and emailed the link to everyone for DWCC	Working with Experts	300	150
M. Bray	1/28/20	1	1	Continuing creating notes from case research for the DWCC team to draft a reply to the opposition regarding standing. Emailed my notes to the team	Opposition for Standing	300	300
M. Bray	1/31/20	7	7	Gathering everything needed for DWCC trip next week for depositions	Deposition	300	2100
M. Bray	2/2/20	2	2	Picked up the rental car from Enterprise for the trip to DWCC for depositions. Drove to the office and packed the things we need	DWCC Visits	300	600
M. Bray	2/2/20	6.5	6.5	Drove from New Orleans to Ruston and checked into the hotel for depositions at DWCC for the week	DWCC Visits	300	1950
M. Bray	2/3/20	0.5	0.5	Went through security and drove to South Compound to defend remaining 2 depositions	DWCC Visits	300	150
M. Bray	2/3/20	2	2	Defended 2 remaining depositions	Deposition	300	600
M. Bray	2/3/20	2	2	Working lunch before taking the deposition of Joel Williams	Deposition	300	600
M. Bray	2/3/20	2	2	Deposition of Joel Williams	Deposition	300	600
M. Bray	2/3/20	0.5	0.5	Talked with Katie on the phone about the Joel Williams depo today and discussed questions for the depo of Asst Warden Baird	Deposition	300	150
M. Bray	2/4/20	0.5	0.5	Went through security and set up for the deposition of Vincent Coleman	DWCC Visits	300	150
M. Bray	2/5/20	1	1	Drove from Ruston to DWCC for depositions	DWCC Visits	300	300
M. Bray	2/5/20	0.5	0.5	Went through security and set up for deposition of Asst Warden Baird	DWCC Visits	300	150
M. Bray	2/6/20	0.5	0.5	Went through security and set up for deposition of Col. Tyronne Mays	DWCC Visits	300	150
M. Bray	2/6/20	7.5	7.5	Deposition of Col. Tyrone Mays	Deposition	300	2250
M. Bray	2/6/20	1	1	Drove from DWCC back to Ruston	DWCC Visits	300	300
M. Bray	2/7/20	7	7	Drove from Ruston back to New Orleans	DWCC Visits	300	2100
M. Bray	2/10/20	0.5	0.5	Received electronic transcripts and exhibits from DWCC depositions. Saved to Dropbox	Deposition	300	150
M. Bray	2/11/20	2	2	Drafting Mtn to Compel for DWCC	Motion to Compel	300	600
M. Bray	2/11/20	0.5	0.5	Drafted a follow up email to send to opposing counsel to follow up after our meet and confer on 1/22 as per our agreement. They promised all production by 2/14 and we agreed to follow up before then to make sure we were on track	Discovery	300	150
M. Bray	2/12/20	0.5	0.5	Received transcript for Huey and exhibits, saved to Dropbox	Case Management - Document Management	300	150
M. Bray	2/13/20	2	2	Gathering documents for the supplemental response for DWCC	Discovery	300	600
M. Bray	2/18/20	3	3	DWCC doc review	DWCC Doc Review	300	900
M. Bray	2/19/20	0.5	0.5	Received order granting our motion to compel for DWCC. Saved and reviewed	Motion to Compel	300	150
M. Bray	2/28/20	3	3	Updated discovery folders for DWCC to ensure all productions are accounted for.	Discovery	300	900
M. Bray	3/9/20	1	1	Conversations with the team discussing BR depositions for DWCC. Opposing counsel is refusing to produce the deponents	Deposition	300	300
M. Bray	3/9/20	4.5	4.5	Gathering docs for supplemental discovery	Discovery	300	1350
M. Bray	3/13/20	0.5	0.5	Received an order from the court granting our second motion to amend for DWCC. Downloaded and saved, reviewed the order	Motion to Amend	300	150
M. Bray	3/18/20	5	5	Gathering supplemental info for discovery responses for DWCC	Discovery	300	1500
M. Bray	3/20/20	0.5	0.5	Meet and confer call with Randy and Keith re. DWCC depo scheduling	Deposition - Preparation	300	150
M. Bray	3/31/20	1	1	Updated folder for Dan Pacholke with depositions and other documents re. DWCC and emailed the team that if they want to check it out before I send it they can	Working with Experts	300	300
M. Bray	3/31/20	2	2	Updating folders with files for experts for DWCC to send updated links with additional documents	Working with Experts	300	600
M. Bray	4/2/20	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	4/2/20	0.5	0.5	Opposing counsel filed an opposition to our 3rd Motion to compel for DWCC. Saved to Dropbox, printed and reviewed	Motion to Compel	300	150
M. Bray	4/9/20	0.5	0.5	Call with Kathy Burns to check in and make sure she has everything she needs. I sent her the link to the expert folder again	Working with Experts	300	150
M. Bray	4/15/20	3.5	3.5	Review of records for LA, creating a spreadsheet noting important things for the expert review	Working with Experts	300	1050
M. Bray	4/21/20	1	1	Breaking up records for client CD and creating an index for experts	Working with Experts	300	300
M. Bray	4/22/20	5.5	5.5	Breaking up records for client CD and creating an index for experts	Working with Experts	300	1650
M. Bray	4/22/20	0.5	0.5	Video call with Jon and Emma to discuss DWCC work and timeline for completion. We will discuss further tomorrow morning at our weekly meeting	Case Management - Planning	300	150
M. Bray	4/30/20	0.5	0.5	Video chat with Katie to discuss work flow for DWCC	Case Management - Planning	300	150
M. Bray	5/19/20	0.5	0.5	Discussed issue of being able to reach client JR with Emma.	Client Communications	300	150
M. Bray	5/21/20	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	5/27/20	0.5	0.5	Received an order on our motion to compel for DWCC. Saved to Dropbox, reviewed.	Motion to Compel	300	150
M. Bray	6/18/20	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300

Detailed Time Entries - Half-Hour Increments							Exhibit 1	
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total	
M. Bray	6/26/20	6.5	6.5	Creating an overview of Anthony Tellis to prep Ron for his deposition on Tuesday. Emailed to Jon and Emma to get feedback on the format I put the info in	Deposition - Preparation	300	1950	
M. Bray	6/29/20	5.5	5.5	Preparing individual summaries for Ron's depo prep. Emailed to team and uploaded for Ron	Deposition - Preparation	300	1650	
M. Bray	7/4/20	3	3	Creating a document explaining the recent production of discovery for DWCC and what we are still missing in preparation to draft a motion to compel. Emailed it to the team to discuss at the meeting on Wednesday	Motion to Compel	300	900	
M. Bray	7/7/20	0.5	0.5	Discussed protective order for DWCC with Emma, she is working on the draft now and will send it to me when she's done	Motion for Protective Order	300	150	
M. Bray	7/8/20	2	2	DWCC weekly meeting	Case Management - Team Meeting	300	600	
M. Bray	7/8/20	3	3	Revising draft of MISO protective order for DWCC	Motion for Protective Order	300	900	
M. Bray	7/9/20	2	2	Finished revisions on the MISO protective order and emailed around to the DWCC team for further revisions and Jon's addition of depo info	Motion for Protective Order	300	600	
M. Bray	7/13/20	2	2	Revised MISO, Motion, and Ron's Affidavit for the protective order for DWCC and sent back around to the team for final looks.	Motion for Protective Order	300	600	
M. Bray	8/6/20	1	1	DWCC weekly meeting.	Case Management - Team Meeting	300	300	
M. Bray	8/6/20	2	2	Revising depo questions for Leblanc. Emailed to the team	Deposition - Preparation	300	600	
M. Bray	8/7/20	0.5	0.5	Gathered all info needed for the DWCC meet and confer call	Meet and Confer	300	150	
M. Bray	8/7/20	0.5	0.5	Meet and confer call with Keith re. DWCC discovery issues	Discovery	300	150	
M. Bray	8/7/20	0.5	0.5	Follow up discussion with Emma and Jon re. DWCC	Call/Discussion - Co-counsel	300	150	
M. Bray	8/9/20	1	1	Reviewing C05 reports for 2019 for LeBlanc and Smith depositions	Deposition - Preparation	300	300	
M. Bray	8/9/20	6	6	Depo prep for Smith and LeBlanc	Deposition - Preparation	300	1800	
M. Bray	8/11/20	1	1	Call with Experts for DWCC	Working with Experts	300	300	
M. Bray	8/13/20	0.5	0.5	DWCC weekly meeting	Case Management - Team Meeting	300	150	
M. Bray	8/13/20	0.5	0.5	Finished verifying the things in the expert file, will need to send the link for the Dropbox again	Working with Experts	300	150	
M. Bray	8/15/20	1	1	Finalized motion for contempt for DWCC and email to the team for review	Motion for Contempt	300	300	
M. Bray	8/19/20	1	1	DWCC team meeting to discuss tasks and priorities	Case Management - Team Meeting	300	300	
M. Bray	8/19/20	4	4	Reorganizing the files for Craig Haney DWCC	Working with Experts	300	1200	
M. Bray	9/3/20	0.5	0.5	Reorganizing files for Craig Haney	Working with Experts	300	150	
M. Bray	9/4/20	0.5	0.5	Reorganizing files for experts for DWCC	Working with Experts	300	150	
M. Bray	9/5/20	6	6	Reorganizing files for experts	Working with Experts	300	1800	
M. Bray	9/6/20	5	5	Reorganizing files for experts	Working with Experts	300	1500	
M. Bray	9/7/20	11	11	Reorganizing files for experts	Working with Experts	300	3300	
M. Bray	9/8/20	0.5	0.5	Update call with experts for DWCC	Working with Experts	300	150	
M. Bray	9/10/20	2	2	Reviewing photos from expert walk through at DWCC and creating index	Working with Experts	300	600	
M. Bray	9/16/20	1	1	Drafting reply to Defendants' opposition to 4th Motion to Compel for DWCC	Motion to Compel	300	300	
M. Bray	9/22/20	1	1	DWCC team meeting to discuss issues before the status conference with Judge Foote tomorrow	Status Conference - Preparation	300	300	
M. Bray	9/22/20	2	2	Pre status conference meeting with Jon and Emma to moot the issues for Judge Foote. Brought Katie in to discuss potential timeline discussions	Status Conference - Judge Foote	300	600	
M. Bray	9/23/20	0.5	0.5	Post status conference meeting with Katie, Jon, and Emma to discuss DWCC	Status Conference	300	150	
M. Bray	9/30/20	5	5	Drafting MISO objection to R&R of Magistrate Judge for DWCC	Objection to Report & Recommendations	300	1500	
M. Bray	9/30/20	0.5	0.5	Discussed objection to R&R with Jon to strategize. I am taking the draft back to continue working on it	Objection to Report & Recommendations	300	150	
M. Bray	9/30/20	3.5	3.5	Reading Ron's depo and drafting MISO objection to R&R for DWCC	Objection to Report & Recommendations	300	1050	
M. Bray	10/1/20	0.5	0.5	Reviewing DWCC Doc Review Status spreadsheet and updated as necessary	DWCC Doc Review	300	150	
M. Bray	10/1/20	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300	
M. Bray	10/2/20	4.5	4.5	Reviewing discovery to update spreadsheet to create a work plan	Discovery	300	1350	
M. Bray	10/4/20	4.5	4.5	Reviewing status of DWCC disco review and FM uploads for work plan	Discovery	300	1350	
M. Bray	10/5/20	5	5	Working through my todo list of doc review for DWCC	DWCC Doc Review	300	1500	
M. Bray	10/7/20	0.5	0.5	Discussion with Ron, Jon, and Emma re. DWCC and the Amicus. Jon and Ron will revise the appeal before Katie finishes her review.	Amicus	300	150	
M. Bray	10/8/20	2	2	Revising the work plan, adding file locations and changing priority for Defendant Witness files	Working with Witnesses	300	600	
M. Bray	10/9/20	1	1	Meeting with Jon and Emma to discuss scheduling prison calls	Client Communications	300	300	
M. Bray	10/10/20	2	2	Reviewing N4 Key logs for DWCC Doc Review	DWCC Doc Review	300	600	
M. Bray	10/15/20	0.5	0.5	DWCC Weekly Meeting	Case Management - Team Meeting	300	150	
M. Bray	10/15/20	4.5	4.5	DWCC Doc Review	DWCC Doc Review	300	1350	
M. Bray	10/19/20	0.5	0.5	Received a return call from Dan Pacholke, discussed what documentation he needs for the named plaintiffs.	Working with Experts	300	150	
M. Bray	10/20/20	1	1	Finished updating file locations for all individuals for DWCC Doc Review.	DWCC Doc Review	300	300	
M. Bray	10/21/20	2	2	Reviewing DWCC letters and revising responses	Intake Letters	300	600	
M. Bray	10/21/20	3.5	3.5	DWCC Doc Review - N4 Key logs	DWCC Doc Review	300	1050	
M. Bray	10/22/20	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300	
M. Bray	10/22/20	1	1	DWCC Doc Review - breaking out RFP 134	RFP	300	300	
M. Bray	10/22/20	2	2	Moot with Jon for Motion in Limine for DWCC	Motion in Limine	300	600	
M. Bray	10/23/20	0.5	0.5	DWCC Doc Review - N4 Key Logs	DWCC Doc Review	300	150	
M. Bray	10/26/20	1	1	Discussed DWCC Discovery with Emma	Discovery	300	300	
M. Bray	11/3/20	3	3	Revising Reply to Opposition to Appeal of Magistrate for 30(b)(6) and emailed back around to DWCC team	30(b)(6) Deposition	300	900	
M. Bray	11/9/20	0.5	0.5	Discussed DWCC with Emma and what needs to be delegated	Case Management - Planning	300	150	
M. Bray	11/9/20	0.5	0.5	Discussion with Jon, Emma, Leah re. DWCC and redistributing the workload	Case Management - Planning	300	150	
M. Bray	11/19/20	1	1	DWCC Weekly Meeting	Case Management - Team Meeting	300	300	
M. Bray	11/24/20	0.5	0.5	Adding files to flash drive for upload team	Case Management - Document Management	300	150	
M. Bray	11/24/20	0.5	0.5	Got a call back from Bruce Charles	Client Communications	300	150	
M. Bray	11/24/20	2	2	DWCC Doc Review - client CT files in Filemaker	DWCC Doc Review	300	600	
M. Bray	11/24/20	2	2	Adding files to expert folders and updating index for each. Emailed Dropbox links to each of the experts. Emailed Dan and Kathy to schedule a check in	Working with Experts	300	600	
M. Bray	11/25/20	0.5	0.5	Brief meeting with Ron, Katie & Emma to discuss order on 30(b)(6) and work plan	Deposition	300	150	
M. Bray	11/30/20	1	1	Review of DWCC work plan and numbers of files	Case Management - Planning	300	300	
M. Bray	11/30/20	5.5	5.5	Revising DWCC Doc Review Work Plan	DWCC Doc Review	300	1650	
M. Bray	12/1/20	1	1	Revising DWCC Doc Review Work Plan	DWCC Doc Review	300	300	
M. Bray	12/1/20	0.5	0.5	Call with Kathy Burns to check in	Working with Experts	300	150	
M. Bray	12/2/20	1	1	DWCC Doc Review - Whatever files are in FileMaker system assigned to me	DWCC Doc Review	300	300	

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	12/7/20	0.5	0.5	Called Mikey with Slate Tech re. the invoice, it was not paid. Emailed invoice to AP to be paid.	Case Management - Document Management	300	150
M. Bray	12/7/20	3	3	DWCC Doc Review - Revising the info the uploaders have, revising work plan, reviewing docs	DWCC Doc Review	300	900
M. Bray	12/9/20	0.5	0.5	Interview with Alexis Stanley for short term doc review for DWCC	Staffing Matters	300	150
M. Bray	12/10/20	0.5	0.5	Interview with Joshua Johnson	Staffing Matters	300	150
M. Bray	12/13/20	3.5	3.5	30(b)(6) depo prep for Ron, gathering info from multiple sources and compiling into one document	30(b)(6) Deposition - Preparation	300	1050
M. Bray	12/14/20	0.5	0.5	Morning logistical meeting with Joshua & Alexis before they start doing their doc review for DWCC	Staffing Matters	300	150
M. Bray	12/14/20	1	1	Updating file info for everything the doc upload team has	Case Management - Document Management	300	300
M. Bray	12/17/20	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	12/21/20	5.5	5.5	Continuing DWCC Doc Review	DWCC Doc Review	300	1650
M. Bray	12/22/20	0.5	0.5	DWCC Doc Review	DWCC Doc Review	300	150
M. Bray	12/24/20	0.5	0.5	DWCC team meeting cancelled, but met with Joshua and Alexis to discuss their progress and check in.	Case Management - Team Meeting	300	150
M. Bray	12/28/20	5	5	Compiling info for Ron to review for 30(b)(6) depo, adding info to the database Ron created earlier today.	Deposition	300	1500
M. Bray	12/29/20	4.5	4.5	30(b)(6) depo prep	30(b)(6) Deposition - Preparation	300	1350
M. Bray	12/29/20	6	6	Continuing 30(b)(6) depo prep	30(b)(6) Deposition - Preparation	300	1800
M. Bray	12/31/20	6	6	30(b)(6) prep with the team and gathering info for Ron	30(b)(6) Deposition - Preparation	300	1800
M. Bray	1/2/21	7	7	30(b)(6) depo prep	30(b)(6) Deposition - Preparation	300	2100
M. Bray	1/5/21	6.5	6.5	30(b)(6) deposition of Ron	30(b)(6) Deposition - Preparation	300	1950
M. Bray	1/7/21	1	1	Call with Craig, Kathy, Dan & Emma to discuss status of reports, what (if anything) everyone needs, and to discuss a few substantive suggestions to Craig and Kathy. Need an update on the eta for Dan's report.	Working with Experts	300	300
M. Bray	1/9/21	2	2	Received Dan's report for DWCC, did as much of my review as possible before passing it along to Emma	Working with Experts	300	600
M. Bray	1/14/21	0.5	0.5	DWCC attorney team meeting to discuss logistics	Case Management - Team Meeting	300	150
M. Bray	1/14/21	3.5	3.5	DWCC Doc Review - client AB	DWCC Doc Review	300	1050
M. Bray	1/18/21	0.5	0.5	DWCC Doc Review - AB	DWCC Doc Review	300	150
M. Bray	1/19/21	4.5	4.5	DWCC Doc Review - AB	DWCC Doc Review	300	1350
M. Bray	1/20/21	2	2	DWCC Doc Review - AB	DWCC Doc Review	300	600
M. Bray	1/21/21	1	1	DWCC Weekly Meeting	Case Management - Team Meeting	300	300
M. Bray	1/25/21	2	2	DWCC Doc Review - AB	DWCC Doc Review	300	600
M. Bray	1/25/21	2	2	Researching the subpoena duces tecum issue for the SDT issued to Mikey with Slate for DWCC	Legal Research	300	600
M. Bray	1/27/21	5.5	5.5	Researching publications for both John Thompson and Craig Haney	Working with Experts	300	1650
M. Bray	1/28/21	1	1	DWCC Weekly Meeting	Case Management - Team Meeting	300	300
M. Bray	1/28/21	2	2	DWCC Doc Review	DWCC Doc Review	300	600
M. Bray	1/29/21	1	1	DWCC team attorney meeting re. Doc review	DWCC Doc Review	300	300
M. Bray	2/1/21	2	2	DWCC Doc Review	DWCC Doc Review	300	600
M. Bray	2/2/21	0.5	0.5	Met with Joshua, discussed Filemaker doc review and some issues with his entries.	Case Management - Staffing	300	150
M. Bray	2/2/21	3.5	3.5	DWCC Doc Review - client AB	DWCC Doc Review	300	1050
M. Bray	2/4/21	3	3	DWCC Doc Review - client AB	DWCC Doc Review	300	900
M. Bray	2/10/21	0.5	0.5	Reviewed list of articles I found against an expert publication list from Westlaw for John Thompson, marked the ones I've already found and sent the list to Lee to help find the remainder	Working with Experts	300	150
M. Bray	2/10/21	3.5	3.5	DWCC Doc Review - client AB	DWCC Doc Review	300	1050
M. Bray	2/24/21	1	1	DWCC expert deposition strategy discussion; Jon will depose Seal again	Deposition	300	300
M. Bray	3/4/21	3	3	Researched the question of non-testifying experts still being deposed. Sent a proposed email to the DWCC team	Working with Experts	300	900
M. Bray	3/4/21	0.5	0.5	Discussed DWCC with Emma	Call/Discussion - Co-counsel	300	150
M. Bray	3/9/21	0.5	0.5	Brief call with Craig Haney & Emma.	Working with Experts	300	150
M. Bray	3/11/21	0.5	0.5	DWCC Doc Review	DWCC Doc Review	300	150
M. Bray	3/11/21	2	2	Reviewing attachments to Thompson's report for DWCC	Working with Experts	300	600
M. Bray	3/14/21	2	2	Reviewed DWCC intake letters and revised memos and responses. Sent an email to Leah and Emma that it was done and they were ready for mailing	Intake Letters	300	600
M. Bray	3/15/21	6	6	Deposition of Mikey Harvey with Slate for DWCC, Jon defended.	Deposition	300	1800
M. Bray	3/15/21	1	1	Debrief from the deposition	Deposition - Debrief	300	300
M. Bray	3/15/21	3.5	3.5	DWCC Doc Review - Finished client MJ and started client LJ	DWCC Doc Review	300	1050
M. Bray	3/16/21	1	1	Creating list of individuals that their evals were included with Thompson's report	Working with Experts	300	300
M. Bray	3/16/21	2	2	Depo prep call with Craig & Kathy to discuss Thompson's report and some preliminary depo prep for them	Deposition - Preparation	300	600
M. Bray	3/18/21	0.5	0.5	Filling in chart of mental exams by John Thompson	Working with Experts	300	150
M. Bray	3/21/21	3	3	Drafting direct questions for John Thompson	Trial Preparation	300	900
M. Bray	3/22/21	2	2	Call with Kathy, Bruce, and Jon to prep Kathy for her deposition this week	Deposition - Preparation	300	600
M. Bray	3/23/21	5	5	Reviewing documents and working on direct of John Thompson	Trial Preparation	300	1500
M. Bray	3/23/21	0.5	0.5	Had a call with Emma, discussed a few things that came out of Dan's depo today	Deposition	300	150
M. Bray	3/24/21	1	1	Deposition of Kathy Burns, observed after my meeting in Baton Rouge	Deposition	300	300
M. Bray	3/26/21	4.5	4.5	Deposition of Michael Richmond	Deposition	300	1350
M. Bray	3/26/21	0.5	0.5	Remainder of the deposition of Michael Richmond	Deposition	300	150
M. Bray	3/26/21	2	2	Printed and organized documents produced for Thompson for DWCC	Case Management - Document Management	300	600
M. Bray	3/28/21	1	1	Revised and added questions to Thompson direct	Trial Preparation	300	300
M. Bray	3/29/21	6	6	Continued reviewing documents and revising questions for direct of John Thompson	Trial Preparation	300	1800
M. Bray	3/31/21	1	1	Went to office and set up all documents in preparation for deposition of John Thompson	Deposition - Preparation	300	300
M. Bray	3/31/21	7	7	Deposition of John Thompson	Deposition	300	2100
M. Bray	4/1/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	4/2/21	3	3	Observed deposition of Upchurch	Deposition	300	900
M. Bray	4/2/21	2	2	Met with Craig Haney to prepare for his deposition on Monday	Deposition - Preparation	300	600
M. Bray	4/5/21	6	6	Deposition of Craig Haney	Deposition	300	1800
M. Bray	4/6/21	0.5	0.5	Drafted email to the DWCC team with things to think over before our Thursday meeting. Also drafted a preservation letter for the court reporter's work product video recordings and included with the email	Preservation Letter	300	150
M. Bray	4/8/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	4/9/21	0.5	0.5	Drafting the notes of my conversation with Connell Archey	Working with Experts	300	150
M. Bray	4/12/21	0.5	0.5	Read emails, replied to Rob Cobbs with DWCC info and policies.	Case Management	300	150

Detailed Time Entries - Half-Hour Increments							Exhibit 1	
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total	
M. Bray	4/16/21	0.5	0.5	Contacted LSP to discuss attorney visits, they are not currently allowing in person visits. They are allowing zoom calls. Emailed with Crystal Osterberger to schedule a Zoom call with CT. It is set for Friday 4/23, I set up and emailed a Zoom link	DWCC Visits - Preparation	300	150	
M. Bray	4/19/21	0.5	0.5	Created a folder for Rob Cobbs with depositions and expert stuff in it. Emailed the link to that folder to him.	Deposition	300	150	
M. Bray	4/20/21	0.5	0.5	Updated the call memos with my notes and saved to Dropbox for two clients	Call Memo	300	150	
M. Bray	4/23/21	0.5	0.5	Reviewing DWCC deposition transcripts	Deposition - Transcripts	300	150	
M. Bray	4/23/21	1	1	Zoom call with client at LSP	Client Communications	300	300	
M. Bray	4/26/21	1	1	Turned my notes from calls with everyone at DWCC into memos and saved them to the files	Case Management	300	300	
M. Bray	4/26/21	3	3	Reviewing transcript of Craig Haney	Deposition	300	900	
M. Bray	4/26/21	1	1	Reviewing transcript of Hayden	Deposition	300	300	
M. Bray	4/27/21	1	1	Reviewing depositions for DWCC	Deposition	300	300	
M. Bray	4/27/21	0.5	0.5	Reviewing depositions for DWCC	Deposition	300	150	
M. Bray	4/27/21	3.5	3.5	Reviewing depositions for DWCC	Deposition	300	1050	
M. Bray	4/28/21	0.5	0.5	Reviewed deposition transcripts for DWCC	Deposition - Transcripts	300	150	
M. Bray	4/30/21	0.5	0.5	Drafting Opposition to Motion in Limine motion for DWCC	Motion in Limine	300	150	
M. Bray	5/3/21	0.5	0.5	Drafting opposition to Motion in Limine for DWCC	Motion in Limine	300	150	
M. Bray	5/3/21	3	3	Drafting opposition to Motion in Limine for DWCC	Motion in Limine	300	900	
M. Bray	5/3/21	0.5	0.5	Drafting opposition to Motion in Limine for DWCC	Motion in Limine	300	150	
M. Bray	5/5/21	2	2	Drafting opposition to Motion in Limine for DWCC and revising class cert supplement	Motion in Limine	300	600	
M. Bray	5/5/21	3	3	Drafting opposition to Motion in Limine for DWCC	Motion in Limine	300	900	
M. Bray	5/13/21	1	1	DWCC Weekly Meeting	Case Management - Team Meeting	300	300	
M. Bray	5/14/21	3	3	Revising opposition to Motion in Limine for DWCC. Emailed to team for Katie to review tomorrow morning	Motion in Limine	300	900	
M. Bray	5/17/21	1	1	Research for draft opposition to Motion in Limine	Motion in Limine	300	300	
M. Bray	5/20/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300	
M. Bray	5/22/21	1	1	Entering our settlement agreement provisions into the spreadsheet	Settlement Agreement	300	300	
M. Bray	5/23/21	2	2	Creating summary of my notes from Dauzat's first depo for the file	Deposition	300	600	
M. Bray	5/24/21	6	6	Drove from New Orleans to Monroe for Mediation	Mediation - Travel	300	1800	
M. Bray	5/24/21	2	2	Prep for mediation beginning tomorrow	Mediation	300	600	
M. Bray	5/25/21	9	9	Mediation with Judge McClusky in Monroe	Mediation	300	2700	
M. Bray	5/26/21	3	3	Mediation with Judge McClusky in Monroe	Mediation	300	900	
M. Bray	5/26/21	5.5	5.5	Drove from Monroe back to New Orleans	Travel	300	1650	
M. Bray	6/3/21	1	1	Revising the reply to opposition for class cert drafted by Rob	Class Certification	300	300	
M. Bray	6/3/21	0.5	0.5	Drafted a reply to Defendants supplemental response to our settlement proposal, per Magistrate McClusky's response. I will review it in the morning before sending it around to the team for review.	Settlement Agreement	300	150	
M. Bray	6/5/21	6.5	6.5	Researching and drafting MISO partial summary judgment on 8th Amend for DWCC	Motion for Summary Judgement - Eighth Amendment	300	1950	
M. Bray	6/9/21	0.5	0.5	Reviewed revisions to our response to Defendants' most recent settlement proposal, made revisions and emailed back to the team for final thoughts before I email it.	Settlement Agreement	300	150	
M. Bray	6/10/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300	
M. Bray	6/13/21	3.5	3.5	Drafting MSJ for DWCC	Motion for Summary Judgement - ADA & RA	300	1050	
M. Bray	6/14/21	1	1	Discussed DWCC with Katie. I will review Jon's ADA section of the MSJ and email my thoughts out to the team.	Motion for Summary Judgement - ADA & RA	300	300	
M. Bray	6/20/21	2	2	Finished creating spreadsheet comparing different versions of the classification policy for DWCC. Highlighted different language in 2021 policy in blue text	Case Matters	300	600	
M. Bray	6/20/21	0.5	0.5	Finished reviewing the MISO MSJ for 8th Amend claims with notes.	Motion for Summary Judgement - Eighth Amendment	300	150	
M. Bray	6/29/21	0.5	0.5	Call with David Fathi re. Motion in Limine hearing for DWCC	Motion in Limine	300	150	
M. Bray	6/29/21	3	3	Drafting Reply to MSJ on 8th Amend claims for DWCC; shared the Google Doc with the team to allow it to be live and for edits and revisions to begin	Motion for Summary Judgement - Eighth Amendment	300	900	
M. Bray	7/5/21	2	2	Creating electronic versions of deposition review for Dauzat 1 & 2	Deposition	300	600	
M. Bray	7/7/21	3	3	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	900	
M. Bray	7/7/21	1	1	DWCC meeting to discuss division of labor for the Reply to MSJ 8th Amend for DWCC	Motion for Summary Judgement - Eighth Amendment	300	300	
M. Bray	7/7/21	3.5	3.5	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	1050	
M. Bray	7/7/21	1	1	Reviewing the changes to the 8th Amend Reply, accepting changes to the document to clean it up	Motion for Summary Judgement - Eighth Amendment	300	300	
M. Bray	7/8/21	2	2	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	600	
M. Bray	7/9/21	2	2	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	600	
M. Bray	7/9/21	0.5	0.5	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	150	
M. Bray	7/9/21	1	1	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	300	
M. Bray	7/10/21	1	1	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	300	
M. Bray	7/12/21	0.5	0.5	Accepting changes to Reply to MSJ on 8th Amend for DWCC to figure out what needs to be done today	Motion for Summary Judgement - Eighth Amendment	300	150	
M. Bray	7/12/21	1	1	Continued revising reply to MSJ 8th Amend for DWCC, pulling documents and cites	Motion for Summary Judgement - Eighth Amendment	300	300	
M. Bray	7/12/21	17.5	17.5	Revising reply to MSJ 8th Amend for DWCC, pulling documents and cites. Made several attempts to file the MSJ, got the main pleading and 10 exhibits filed. ECF is no longer repsonding, I will need to contact the help desk when they open.	Motion for Summary Judgement	300	5250	
M. Bray	7/14/21	0.5	0.5	Call with Kathy Burns re. upcoming Motion in Limine hearing. We will circulate draft questions to her to prepare	Motion in Limine	300	150	
M. Bray	7/19/21	1	1	Finalized Motion in Limine direct questions for Haney and emailed to DWCC team for review	Motion in Limine	300	300	
M. Bray	7/21/21	0.5	0.5	Finished revising the direct questions for Haney, emailed them to him for review and consideration	Working with Experts	300	150	
M. Bray	7/21/21	0.5	0.5	Received a second draft of the affidavit from Leah; replied that she can send the word version to the team, this is a great starting point for the attorneys to work off of	Client Communications	300	150	
M. Bray	7/21/21	1	1	Drafting Surreply to MSJ 8th A	Motion for Summary Judgement - Eighth Amendment	300	300	

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	7/22/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	7/22/21	0.5	0.5	Exchanged emails with Katie re. the 1st A claims for DWCC	Call/Discussion - Co-counsel	300	150
M. Bray	7/24/21	2	2	Finished draft of surreply for 8th A MSJ, emailed to team for review	Motion for Summary Judgement - Eighth Amendment	300	600
M. Bray	7/25/21	1	1	Zoom call with experts and team for DWCC before the hearing tomorrow	Motion in Limine	300	300
M. Bray	7/25/21	1	1	Call with Jon, Katie and Emma to discuss the hearing tomorrow and last minute prep	Motion in Limine	300	300
M. Bray	7/26/21	1	1	Drove to the office and set up for the Daubert hearing	Motion in Limine Hearing	300	300
M. Bray	7/26/21	0.5	0.5	Reviewing Reply to MSJ in support again, need to address Burns issues	Motion for Summary Judgement - Eighth Amendment	300	150
M. Bray	7/27/21	0.5	0.5	Revising Surreply for 8th A MSJ	Motion for Summary Judgement - Eighth Amendment	300	150
M. Bray	7/27/21	0.5	0.5	Call with Katie	Vague	300	150
M. Bray	7/28/21	0.5	0.5	Researching Tellis' records to find cites to support what we state in our surreply	Sur-Reply	300	150
M. Bray	7/28/21	1	1	Reviewed final draft of surreply to MSJ 8th A; added TOC and TOA, finalized and filed	Motion for Summary Judgement - Eighth Amendment	300	300
M. Bray	8/5/21	2	2	DWCC weekly meeting; discussed trial staffing and resources for first hour, then focused on remainder of agenda	Case Management - Team Meeting	300	600
M. Bray	8/9/21	0.5	0.5	Reviewed lists of witnesses for Plaintiff and Defendant to ensure notes are updated before the meeting this afternoon	Working with Witnesses	300	150
M. Bray	8/11/21	1	1	Discussion with DWCC team for how to handle Defendants' motion to consider new facts and prepare for the upcoming phone conference on Monday	Motion to Reopen Discovery	300	300
M. Bray	8/16/21	0.5	0.5	Reviewed draft of what Emma and Jon had been working on while I was out to prepare for the phone conference today. Sent a message to Jon asking for a call to ask some questions before the phone conference	Case Management	300	150
M. Bray	8/19/21	2	2	DWCC weekly meeting	Case Management - Team Meeting	300	600
M. Bray	8/26/21	0.5	0.5	DWCC weekly meeting	Case Management - Team Meeting	300	150
M. Bray	8/26/21	0.5	0.5	Moot for call with Judge Foote at 11	Motion to Reopen Discovery	300	150
M. Bray	9/8/21	0.5	0.5	Zoom call with LJ. Unable to speak with RB because the internet would not work in the area where he lives.	Case Management	300	150
M. Bray	9/8/21	0.5	0.5	Debrief with Emma from call with LJ, she also recapped the calls she had with guys at DWCC and pointed out the similarities	Case Management	300	150
M. Bray	9/10/21	0.5	0.5	Attorney phone call with RB. EHCC took 15 minutes to get him onto the phone, so we were only permitted to speak with him for 15 minutes.	Client Communications	300	150
M. Bray	9/10/21	0.5	0.5	Meet and confer re. DWCC scheduling for remedy phase of trial	Trial Preparation	300	150
M. Bray	9/17/21	1	1	Working with DWCC team to finalize our draft proposed timeline for the remedy phase to get to Defendants for their approval to file with the Court. Emailed our draft to opposing counsel	Call/Email - Opposing Counsel	300	300
M. Bray	9/17/21	0.5	0.5	Had a call with Emma and Katie to work out our decision pursuant to Randy's demand that we delete a sentence. Replied to Randy via email informing him that we are not willing to modify our statement and asking if Defendants are still willing to file jointly.	Case Management	300	150
M. Bray	9/17/21	0.5	0.5	Received revisions to the proposed scheduling order from Defendants with their consent to file. Saved it as a PDF and filed it with the court. Saved the filed copy to Dropbox.	Case Management	300	150
M. Bray	9/17/21	0.5	0.5	Began drafting first set discovery requests for remedy phase for DWCC	Discovery	300	150
M. Bray	9/20/21	0.5	0.5	Drafting first set of discovery requests for remedy phase for DWCC	Discovery	300	150
M. Bray	9/20/21	0.5	0.5	Judge Foote issued an order granting class certification for DWCC. Saved to Dropbox, printed and began reviewing	Class Certification	300	150
M. Bray	9/21/21	0.5	0.5	Status conference with Judge Foote, she is adopting our proposed scheduling order in full and minutes will follow shortly.	Status Conference - Judge Foote	300	150
M. Bray	9/22/21	1	1	Reconvened the DWCC team to finish going through complaint to identify witnesses and evidence for trial	Trial Preparation	300	300
M. Bray	9/23/21	0.5	0.5	Discussed DWCC and work plan with Emma	Case Management - Planning	300	150
M. Bray	9/23/21	0.5	0.5	Finished reviewing the order granting class certification for DWCC and making notes.	Class Certification	300	150
M. Bray	9/23/21	0.5	0.5	Reviewing oppositions to MSJ and adding client names to trial prep spreadsheet to prove particular points	Trial Preparation	300	150
M. Bray	9/24/21	0.5	0.5	Reviewing MSJ to pull facts for trial prep spreadsheet	Trial Preparation	300	150
M. Bray	9/28/21	0.5	0.5	Drafted call memo from my call with client, saved to his file and emailed it to the team with some highlights.	Call Memo	300	150
M. Bray	9/30/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	10/6/21	3	3	Reviewing DWCC discovery and planning for trial	Discovery	300	900
M. Bray	10/7/21	3	3	Calls with 5 people at DWCC; call notes drafted contemporaneously with calls. Will need to turn the notes into formal call memos to be saved into each person's folder.	Call Memo	300	900
M. Bray	10/10/21	4.5	4.5	Working on developing questions for Craig Haney for trial so we can identify exhibits. Reviewing prior materials created for both his deposition and the Motion in Limine hearing. Reviewing his declaration	Trial Preparation	300	1350
M. Bray	10/11/21	3.5	3.5	Meeting with Emma to chart out trial for DWCC and set deadlines between now and then as well as tasks	Trial Preparation	300	1050
M. Bray	10/11/21	0.5	0.5	Reviewed Defendants' objections to our discovery requests, drafted an email and sent to the team pointing out the items that we need to meet and confer on before filing our motion to compel.	Motion to Compel	300	150
M. Bray	10/12/21	1	1	Final review of the opposition for the request to appeal to the 5th Circuit; added TOC/TOA and other necessary portions. Emailed back to the team for a final review before it's filed	Appeal of Class Certification	300	300
M. Bray	10/12/21	2	2	Reviewing Haney's report, drafting questions for Haney, trying to determine what exhibits for Haney	Working with Experts	300	600
M. Bray	10/18/21	1	1	Reviewing list of witnesses and began indicating who is testifying, who is records only, and who is on Haney's list.	Trial Preparation	300	300
M. Bray	10/18/21	3.5	3.5	Gathering documents for exhibits and adding to the Trial folder for DWCC	Trial Exhibits	300	1050
M. Bray	10/19/21	0.5	0.5	Gathering documents for exhibits and adding to the Trial folder for DWCC	Trial Exhibits	300	150
M. Bray	10/21/21	0.5	0.5	Call with Keith for meet and confer, call with Emma to follow up	Meet and Confer	300	150
M. Bray	10/27/21	3	3	Pulling individual documents for exhibits for DWCC	Trial Exhibits	300	900
M. Bray	10/27/21	0.5	0.5	Received Defendants' first production for the remedy phase discovery; began downloading and saved to Dropbox. The remainder of the files will take longer to download, I will save them to Dropbox when they complete the download process tomorrow	Discovery	300	150
M. Bray	10/29/21	2	2	Pulling documents for exhibits for DWCC	Trial Exhibits	300	600
M. Bray	10/29/21	3.5	3.5	Pulling documents for exhibits for DWCC	Trial Exhibits	300	1050

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	10/30/21	4	4	Preparing exhibits for trial. Touched base with Emma when I was done, she will let me know if there's anything she needs my help with today. Otherwise, I'll wait for my turn to review the JPTO tomorrow after Katie	Trial Exhibits	300	1200
M. Bray	10/31/21	0.5	0.5	Reviewing list of witnesses, sent back around to the team with my revisions	Trial Preparation	300	150
M. Bray	11/2/21	3	3	DWCC meeting with Emma	Case Management - Team Meeting	300	900
M. Bray	11/4/21	0.5	0.5	Meeting with Emma and Nishi to discuss depositions and TrialPad	Deposition	300	150
M. Bray	11/5/21	0.5	0.5	Reviewing the division of the files for DWCC exhibits to be marked as exhibits in FM so I can export the list to Excel so we can begin to make sure everything is reviewed	Trial Exhibits	300	150
M. Bray	11/5/21	0.5	0.5	Meeting with Kyle Potts to discuss updates and status of things	Staffing Matters	300	150
M. Bray	11/5/21	1	1	Marking items in Filemaker that we pulled for exhibits so I can export a list into Excel so the team can do a review. Marking the ones I mark as exhibits on the Word doc so we know what to add back in after the export because it isn't in Filemaker	Trial Exhibits	300	300
M. Bray	11/6/21	7.5	7.5	Marking items in Filemaker that we pulled for exhibits so I can export a list into Excel so the team can do a review. Marking the ones I mark as exhibits on the Word doc so we know what to add back in after the export because it isn't in Filemaker	Trial Exhibits	300	2250
M. Bray	11/7/21	8.5	8.5	Marking items in Filemaker that we pulled for exhibits so I can export a list into Excel so the team can do a review. Marking the ones I mark as exhibits on the Word doc so we know what to add back in after the export because it isn't in Filemaker	Trial Exhibits	300	2550
M. Bray	11/8/21	1	1	Finished marking all items as exhibits in Filemaker, with the exception of the remainder of the MH Client Lists that Emma is working on because I'm not sure where she left off	Trial Exhibits	300	300
M. Bray	11/8/21	0.5	0.5	Downloading to Dropbox Defendants' JPTO, exhibits and witness	Joint Pre Trial Conference (JPTO)	300	150
M. Bray	11/10/21	2	2	Meeting with Emma and Jon to discuss last minute issues and strategy for the meet and confer tomorrow on the JPTO	Joint Pre Trial Conference (JPTO)	300	600
M. Bray	11/11/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	11/11/21	0.5	0.5	Debrief with our DWCC team following the meet and confer	Meet and Confer	300	150
M. Bray	11/11/21	1	1	Revising the JPTO from Defendants' version to add back in the uncontested facts they deleted as well as making the revisions we agreed to during our meet and confer	Joint Pre Trial Conference (JPTO)	300	300
M. Bray	11/11/21	3	3	Revising the JPTO to add back in the uncontested fact statements that were deleted and addressing the comments from today's meet and confer for DWCC. Emailed to Jon and Emma for their review.	Joint Pre Trial Conference (JPTO)	300	900
M. Bray	11/17/21	0.5	0.5	Reviewing Defendants' revisions to the JPTO and moving things around as needed	Joint Pre Trial Conference (JPTO)	300	150
M. Bray	11/18/21	0.5	0.5	Reviewing Defendants' exhibits and the JPTO prior to our conference call with Judge Foote.	Trial Exhibits	300	150
M. Bray	11/23/21	0.5	0.5	Meeting with Emma and Jon to discuss reducing the tier logs we intend to enter as exhibits	Trial Exhibits	300	150
M. Bray	11/24/21	0.5	0.5	Had a call with Katie to discuss demonstratives and how that would work for the DWCC case. I will create demonstratives for the MARs and discuss what other demonstratives we could use. We will need to run them by Defendants for their approval at least to the authenticity of the underlying data and we will have that discussion on Monday	Trial Exhibits	300	150
M. Bray	11/24/21	0.5	0.5	Met with Gabby, discussed the next part of her assignment. She is going to be adding her notes from the Seal note reviews to the spreadsheet for the exhibits. Once that's done, she'll add her notes from the review of MH Intakes	Case Management - Staffing	300	150
M. Bray	11/25/21	1	1	Working on spreadsheets for demonstratives for 2018 MARs	Trial Preparation	300	300
M. Bray	11/26/21	6	6	Working on spreadsheets for demonstratives for 2018 MARs	Trial Preparation	300	1800
M. Bray	11/27/21	5.5	5.5	Working on spreadsheets for demonstratives for 2019 MARs	Trial Preparation	300	1650
M. Bray	11/28/21	2	2	Finished updating the 12/2017 MARs to the demonstrative spreadsheet, the only items remaining are the pre-discovery MARs. Revised the exhibit list with those MARS that I removed	Trial Preparation	300	600
M. Bray	11/28/21	3.5	3.5	Removing files from the exhibit folders to reduce them to match the list, moving all reduced files to a secondary folder of "Exhs in Reserve" so we keep track of what we moved just in case we end up needing it for impeachment	Trial Exhibits	300	1050
M. Bray	11/29/21	0.5	0.5	Debrief with Emma and Jon, discussed tasks and timelines to get this done to send to opposing counsel	Case Management - Planning	300	150
M. Bray	11/29/21	0.5	0.5	Revised JPTO again, emailed to Jon and Emma to make sure I didn't miss anything from our call with Defendants' today. Once it's approved, I'll email to Defendants.	Joint Pre Trial Conference (JPTO)	300	150
M. Bray	11/30/21	0.5	0.5	Debrief with Jon and Emma	Case Management	300	150
M. Bray	11/30/21	2	2	Labeled all Plaintiff exhibits on the sheet, added it all to the JPTO and emailed to the team for further review. Emma to add Defendants' list of exhibits to the JPTO before we send it to them for final review before filing	Trial Exhibits	300	600
M. Bray	12/2/21	0.5	0.5	Renaming exhibit files to include the exhibit identification alpha numeric system	Trial Exhibits	300	150
M. Bray	12/2/21	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	12/3/21	3.5	3.5	Renaming exhibit files.	Trial Exhibits	300	1050
M. Bray	12/5/21	0.5	0.5	Reviewed the reply to the spoliation opposition, emailed back around to the team	Motion for Spoliation	300	150
M. Bray	12/7/21	1	1	Reviewing documents and drafting questions for trial	Trial Preparation	300	300
M. Bray	12/7/21	3	3	Drove to Adams & Reese office downtown and met with Kyle Potts to discuss the DWCC litigation. Visited the room we will be using for trial, spoke with the IT people about logistics. Spoke with the head of HR about temporary badges, obtained 24/7 access to the offices for use during trial. Also discussed marking all the exhibits and printing and binding for trial. Drove back to the office	Trial Preparation	300	900
M. Bray	12/8/21	1	1	Drafted motions for leave for the replies that were filed to Defendants' oppositions to our motion in limine and spoliation. Circulated to the team for anyone who would want to review, then filed. Saved filed docs to Dropbox	Motion in Limine	300	300
M. Bray	12/8/21	0.5	0.5	Created links to send to Adams and Reese with the ECF documents and the link to all their files. Emailed it over to Kyle and Liz	Trial Exhibits	300	150
M. Bray	12/9/21	0.5	0.5	Received an email from CM/ECF letting me know that the motion for leave should have a proposed order. I put a couple together and filed each of them as corrective documents	Motion for Leave	300	150
M. Bray	12/9/21	0.5	0.5	Tried to call client CD. Phone didn't even ring, straight to voicemail. Called and spoke to his father instead.	Client Communications - Relative	300	150
M. Bray	12/10/21	8.5	8.5	Reviewing exhibits to draft directs and crosses for trial	Trial Preparation	300	2550
M. Bray	12/13/21	5.5	5.5	Renaming exhibit files for A&R to be able to label them. Emailed the link back to Adams and Reese with the renamed files	Trial Exhibits	300	1650
M. Bray	12/14/21	2	2	Document review for DWCC to draft questions for trial	Trial Preparation	300	600

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	12/15/21	1	1	Reviewed all exhibits with objections for tomorrow, reviewed my notes and printed our exhibit objects and Defendants' exhibit objections.	Trial Exhibits	300	300
M. Bray	12/16/21	4	4	Joint Pretrial Conference for DWCC with Judge Foote	Joint Pre Trial Conference (JPTO)	300	1200
M. Bray	12/16/21	2	2	DWCC debrief to discuss deadlines and assign tasks	Staffing Matters	300	600
M. Bray	12/17/21	3	3	Finished gathering names and info for letters to send releases to. Finalized the letter, prepared it for mail merge. Did the mail merge for the labels and printed them	Mass Mailing	300	900
M. Bray	12/17/21	0.5	0.5	Began drafting a line of questioning for CT's direct	Trial Preparation	300	150
M. Bray	12/18/21	1	1	Document review to draft direct and cross questions	Trial Preparation	300	300
M. Bray	12/18/21	4	4	Document review to draft direct and cross questions	Trial Preparation	300	1200
M. Bray	12/21/21	3.5	3.5	Document review, drafting questions for trial	Trial Preparation	300	1050
M. Bray	12/21/21	3.5	3.5	Finished draft of direct for Adkins, shared with the team. Drafting questions for other MH staff	Trial Preparation	300	1050
M. Bray	12/23/21	4.5	4.5	Drafting questions for Saul, Robinson, Hayden	Working with Experts	300	1350
M. Bray	12/24/21	1	1	Drafting questions for Robinson	Working with Experts	300	300
M. Bray	12/26/21	4	4	DWCC team meeting to plan out the schedule for witnesses for trial and figure out how much of our time we are using.	Trial Preparation	300	1200
M. Bray	12/26/21	2	2	Drafting questions for trial	Trial Preparation	300	600
M. Bray	12/27/21	0.5	0.5	Trial preparations	Trial Preparation	300	150
M. Bray	12/27/21	7.5	7.5	Revised the demonstratives for the MARs, added the citations to all the exhibits that support each month for each year. Saved all as PDFs again, updated the files in A&R Dropbox folder.	Trial Preparation	300	2250
M. Bray	12/29/21	8.5	8.5	Reviewing documents and drafting questions	Trial Preparation	300	2550
M. Bray	12/30/21	1	1	Zoom meeting with CT, discussed his testimony for trial and prepared	Trial Preparation	300	300
M. Bray	12/31/21	3.5	3.5	Reviewing documents and drafting questions for CT and Haney	Working with Experts	300	1050
M. Bray	12/31/21	1	1	Drove to the office and dropped off the binders to Jon, found the sleeves for the DVDs and created an index for the binders	Block Billing	300	300
M. Bray	12/31/21	5	5	Reviewing documents and drafting questions for CT and Haney	Working with Experts	300	1500
M. Bray	1/1/22	3	3	Drafting questions for trial for Haney, reviewing material for him.	Trial Preparation	300	900
M. Bray	1/4/22	0.5	0.5	Joined the Zoom for the meeting with CT. After 10 minutes nobody was there, I called the Warden's office. Apparently, the woman who is responsible for that had to leave earlier today b/c she got a positive Covid test. There was nobody there to set up the Zoom. She called someone to get him and get him set up,	Client Communications	300	150
M. Bray	1/4/22	3	3	Drafting questions for trial	Trial Preparation	300	900
M. Bray	1/5/22	4	4	Trial prep, addressing trial prep issues, drafting questions	Trial Preparation	300	1200
M. Bray	1/5/22	2	2	Trial prep Zoom with CT	Trial Preparation	300	600
M. Bray	1/5/22	2	2	Drafting questions for trial	Trial Preparation	300	600
M. Bray	1/8/22	11	11	Drafting questions for trial, preparing for trial	Trial Preparation	300	3300
M. Bray	1/9/22	4	4	Printing things needed for tomorrow. Finalizing opening statement. Finalizing direct for CT. Prepared housekeeping items with scripts to address before opening. General gathering of all things needed for tomorrow	Trial Preparation	300	1200
M. Bray	1/9/22	1	1	Reivewing documents for CT gathered by D's, made notes on the file for items that he may have personal knowledge about, printed and prepared for the cross.	Trial Preparation	300	300
M. Bray	1/22/22	6	6	Revising line of questions for Goodwin and Haney	Working with Experts	300	1800
M. Bray	1/30/22	11.5	11.5	Drafting questions for Thompson cross	Working with Experts	300	3450
M. Bray	2/7/22	0.5	0.5	Debrief and planning call with Emma and Jon, the FFCL is due 3/7 so we divided up the trial transcripts and the work so it will all get done in time	FFCL	300	150
M. Bray	2/11/22	1	1	Reviewing DWCC letters	Intake Letters	300	300
M. Bray	2/14/22	0.5	0.5	Reviewing DWCC letters	Intake Letters	300	150
M. Bray	2/14/22	1	1	Finished reviewing DWCC letters, emailed Leah that they are all reviewed and ready to be mailed out tomorrow (#1-25)	Intake Letters	300	300
M. Bray	2/17/22	1	1	DWCC Weekly meeting	Case Management - Team Meeting	300	300
M. Bray	2/24/22	0.5	0.5	DWCC weekly meeting; quick check in b/c we are all working on the FFCL	Case Management - Team Meeting	300	150
M. Bray	2/28/22	7.5	7.5	Adding points to the FFCL from the spreadsheet / trial transcripts for the days that I reviewed	FFCL	300	2250
M. Bray	3/2/22	3	3	Adding points to FFCL from spreadsheet	FFCL	300	900
M. Bray	3/3/22	0.5	0.5	DWCC weekly meeting	Case Management - Team Meeting	300	150
M. Bray	3/3/22	1	1	Redacted MARs for exhibits. Will save everything to a hard drive and send to the Court for Monday delivery; will email link to the files to opposing counsel	Trial Exhibits	300	300
M. Bray	3/9/22	4	4	Adding cites to FFCL for DWCC	FFCL	300	1200
M. Bray	3/10/22	6	6	Adding cites to the FFCL from the spreadsheet and from the depositions in lieu	Deposition	300	1800
M. Bray	3/10/22	1	1	Adding cites to the FFCL from Depo of Scriber & Fuller	FFCL	300	300
M. Bray	3/12/22	3	3	Adding citations from depositions to the FFCL	Deposition	300	900
M. Bray	3/13/22	4	4	Conversation with Katie about FFCL and what work needs to be done. Revising FFCL, adding citations, reviewing comments and addressing them.	FFCL	300	1200
M. Bray	3/29/22	4.5	4.5	Reviewing and approving DWCC weekly intake letters; there are 38 in the folder to be reviewed, they are all backlogged	Intake Letters	300	1350
M. Bray	3/31/22	2	2	DWCC weekly meeting	Case Management - Team Meeting	300	600
M. Bray	4/8/22	0.5	0.5	Meeting with Gabby to touch base about her progress with reviewing things for DWCC	Staffing Matters	300	150
M. Bray	4/14/22	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	4/14/22	2	2	Reviewed letters for DWCC, emailed Leah to let her know the ones ready for my review are ready to be mailed.	Client Communications	300	600
M. Bray	4/15/22	0.5	0.5	Organizing spreadsheet of time records for DWCC investigation	Staffing Matters	300	150
M. Bray	4/15/22	0.5	0.5	Meeting with Gabby re. DWCC video review	Case Management	300	150
M. Bray	4/15/22	2	2	Doc review of remedy discovery. Reviewing 1st Prod, RFP 6, 8, 9, 7 for March - May 2020	Discovery	300	600
M. Bray	4/18/22	6.5	6.5	Doc review of remedy discovery	Discovery	300	1950
M. Bray	4/19/22	3.5	3.5	Meeting with Katie to review remedy phase discovery, discuss depositions, scheduling for remedy and staffing.	Discovery	300	1050
M. Bray	4/20/22	1	1	Drafted second set of disco requests for remedy phase, emailed to Katie for her review before I send it to Defendants	Discovery	300	300
M. Bray	4/27/22	3	3	Doc review for remedy discovery - individual records for CB	Discovery	300	900
M. Bray	4/28/22	1	1	Met with Emily to explain to her the first doc review assignments. She will finish entering data for RFP 7 then move on to RFP10	RFP	300	300
M. Bray	4/29/22	0.5	0.5	Meeting with Gabby	Staffing Matters	300	150
M. Bray	5/2/22	0.5	0.5	Finished drafting motion and MISO to compel, emailed to Katie for further review	Motion to Compel	300	150
M. Bray	5/5/22	0.5	0.5	DWCC Doc Review - entering info for UORs from 1st Supp Prod into spreadsheet for Katie to review	Unusual Occurrence Report	300	150
M. Bray	5/6/22	0.5	0.5	DWCC Doc Review - Individual records	DWCC Doc Review	300	150

Detailed Time Entries - Half-Hour Increments							Exhibit 1	
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total	
M. Bray	5/6/22	0.5	0.5	DWCC Doc Review - Individual records	DWCC Doc Review	300	150	
M. Bray	5/6/22	0.5	0.5	DWCC Doc Review - Individual records	DWCC Doc Review	300	150	
M. Bray	5/10/22	2	2	Call with Dan and Kathy re. DWCC for remedy phase	Working with Experts	300	600	
M. Bray	5/10/22	2	2	DWCC Doc Review for remedy - Individual records	DWCC Doc Review	300	600	
M. Bray	5/11/22	2	2	Reviewing letters for DWCC, preparing responses to be mailed, emailed first 7 letters to Plum for mailing	Intake Letters	300	600	
M. Bray	5/16/22	0.5	0.5	Call with Katie about Defendants' may call witness list. Will ask an intern to research question	Trial Preparation	300	150	
M. Bray	5/18/22	4	4	DWCC Doc Review individual records	DWCC Doc Review	300	1200	
M. Bray	5/19/22	1	1	DWCC weekly meeting with Katie and Emily	Case Management - Team Meeting	300	300	
M. Bray	5/22/22	1	1	Drafting additional RFPs for Remedy Phase. Began drafting Motion for Leave to Propound Add'l RFPs	Motion for Leave	300	300	
M. Bray	5/22/22	0.5	0.5	Drafting mass mailing letter for DWCC.	Mass Mailing	300	150	
M. Bray	5/23/22	0.5	0.5	Met with Antonino, he is going to help update the spreadsheet for the mass mailing with everyone's locations.	Mass Mailing	300	150	
M. Bray	5/25/22	2	2	Went to office, printed mass mailing of all the letters for DWCC. Discussed with Antonino	Mass Mailing	300	600	
M. Bray	6/9/22	0.5	0.5	Revising the motion for leave to file additional RFPs for DWCC. Will circulate following the meeting	Motion for Leave to File Excess	300	150	
M. Bray	6/9/22	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300	
M. Bray	6/10/22	1	1	Saving scanned DWCC incoming letters to the weekly intake folder. Will have a meeting with Plum today to review how to do the intake letters	Intake Letters	300	300	
M. Bray	6/16/22	2	2	DWCC weekly meeting	Case Management - Team Meeting	300	600	
M. Bray	6/22/22	1	1	Drafted deposition notices for everyone on our list. Created a calendar of all the depositions for ease of reference. Emailed to the team for review before finalizing and emailing to Defendants.	Deposition - Preparation	300	300	
M. Bray	6/23/22	1	1	DWCC weekly meeting, reviewed letters that came in and the issues people are writing about	Case Management - Team Meeting	300	300	
M. Bray	6/26/22	6	6	Travel from New Orleans to Holiday Inn in Ruston	DWCC Visits - Travel	300	1800	
M. Bray	6/27/22	1	1	Checked in with security in control center, waited on Keith and Warden Goodwin to retrieve us to go to the South side for the walkthrough	DWCC Visits	300	300	
M. Bray	6/27/22	4	4	Walkthrough of one tier on N1, N2 and one tier on N3	DWCC Visits	300	1200	
M. Bray	6/27/22	2	2	Walkthrough of N4 A & B before Keith told us we had to leave for the day. We though we had until 4:00, Keith made it clear we only had until 3 and needed to leave. We have until 4:00 the rest of the week for our interviews.	DWCC Visits	300	600	
M. Bray	6/27/22	1	1	Team strategy meeting to provide me with the list of people each expert wants to interview so I could send the email to Keith	DWCC Visits - Preparation	300	300	
M. Bray	6/28/22	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300	
M. Bray	6/28/22	2	2	Walkthrough of N2C, N4C and N4D with experts	DWCC Visits	300	600	
M. Bray	6/28/22	5	5	Expert interviews, review of records, documenting who signed releases and who was seen cellfront	DWCC Visits	300	1500	
M. Bray	6/28/22	0.5	0.5	Received list of people to interview from each expert, emailed to Keith for tomorrow	DWCC Visits - Preparation	300	150	
M. Bray	6/29/22	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300	
M. Bray	6/29/22	1	1	Drove back to Ruston. The experts left from DWCC to the airport in Shreveport to catch their flights home	DWCC Visits - Travel	300	300	
M. Bray	6/30/22	1	1	Drove from hotel to DWCC	DWCC Visits - Travel	300	300	
M. Bray	6/30/22	0.5	0.5	Checked in with security, got an escort to the South side for our attorney interviews.	DWCC Visits	300	150	
M. Bray	7/1/22	7	7	Drove from Ruston back to New Orleans. Returned rental car back to Enterprise	DWCC Visits	300	2100	
M. Bray	7/9/22	0.5	0.5	Review of the draft opposition to Def Motion for Protective Order. Discussed some revisions with Dalton, he is going to revise and send it back	Motion for Protective Order	300	150	
M. Bray	7/12/22	0.5	0.5	Meet and confer call with Keith and Dalton	30(b)(6) Deposition	300	150	
M. Bray	7/13/22	2	2	Reviewing discovery productions, drafting deposition questions	Deposition	300	600	
M. Bray	7/21/22	0.5	0.5	Reviewing Dalton's reply to the opposition for the 30(b)(6). Added a footnote, compared to my notes from the opposition.	30(b)(6) Deposition	300	150	
M. Bray	7/21/22	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300	
M. Bray	7/21/22	3	3	Reviewing 5th production of discovery to draft deposition questions and also to prepare information for the experts	Discovery	300	900	
M. Bray	7/21/22	1	1	Reviewing 5th production of policies and updating the notes in the spreadsheet.	Discovery	300	300	
M. Bray	7/24/22	2	2	Drafting deposition questions, reviewing discovery	Deposition - Preparation	300	600	
M. Bray	7/24/22	0.5	0.5	Drafting deposition questions, reviewing discovery	Deposition - Preparation	300	150	
M. Bray	7/26/22	0.5	0.5	Discussed DWCC items with Plum, she will scan the documents we received while at DWCC as well as the retainers that were signed. Discussed how to handle some of the returned letters as well.	Case Management	300	150	
M. Bray	7/27/22	0.5	0.5	Reviewing notes before meet and confer call with Keith. Briefly discussed Keith's objection to our 30(b)(6) topics with Dalton	30(b)(6) Deposition	300	150	
M. Bray	7/31/22	6	6	Drove from New Orleans to Ruston	DWCC Visits	300	1800	
M. Bray	8/1/22	1	1	Drove from Ruston to DWCC	DWCC Visits	300	300	
M. Bray	8/1/22	5	5	Depositions 30(b)(6) and Norris	Deposition	300	1500	
M. Bray	8/1/22	3	3	Reviewed medical/MH and Master Prison records for individuals, flagged the documents we want scanned	Case Management	300	900	
M. Bray	8/1/22	1	1	Drove from DWCC back to Ruston	DWCC Visits	300	300	
M. Bray	8/1/22	3	3	Prepared for depositions tomorrow	Deposition - Preparation	300	900	
M. Bray	8/2/22	1	1	Drove from Ruston to DWCC	DWCC Visits	300	300	
M. Bray	8/2/22	1	1	Drove from DWCC back to Ruston	DWCC Visits	300	300	
M. Bray	8/3/22	1	1	Drove from Ruston to DWCC	DWCC Visits	300	300	
M. Bray	8/3/22	0.5	0.5	Set up and got ready for depositions	Deposition - Preparation	300	150	
M. Bray	8/3/22	6	6	Deposition of Acklin and Hayden	Deposition	300	1800	
M. Bray	8/3/22	1	1	Drove from DWCC back to Ruston	DWCC Visits	300	300	
M. Bray	8/4/22	1	1	Drove from Ruston to DWCC	DWCC Visits	300	300	
M. Bray	8/4/22	4	4	Deposition of Kimball and Nail	Deposition	300	1200	
M. Bray	8/4/22	7	7	Drove from DWCC back to New Orleans	DWCC Visits	300	2100	
M. Bray	8/8/22	1	1	Deposition of Gregory Seal via Zoom	Deposition	300	300	
M. Bray	8/9/22	0.5	0.5	Setting up and preparing for depositions	Deposition - Preparation	300	150	
M. Bray	8/9/22	5	5	Deposition of Natalie LaBorde and Blake LeBlanc	Deposition	300	1500	
M. Bray	8/10/22	2	2	Drove from Baton Rouge back to New Orleans	Travel	300	600	
M. Bray	8/14/22	0.5	0.5	Picked up rental car at Enterprise to travel to DWCC for depositions for the week	DWCC Visits	300	150	
M. Bray	8/14/22	2	2	Drove into the office to print documents needed for depositions for the week	Block Billing	300	600	
M. Bray	8/14/22	6.5	6.5	Drove from New Orleans to Ruston	DWCC Visits	300	1950	
M. Bray	8/14/22	1	1	Finalized questions for pill call depositions tomorrow, printed questions and got necessary documents together	Pill Call	300	300	

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	8/15/22	3	3	Pill pass officer depositions of Cody Rimmer and Austin Burns	Pill Call	300	900
M. Bray	8/15/22	1	1	Drove from DWCC back to hotel	DWCC Visits	300	300
M. Bray	8/15/22	6.5	6.5	Drafting deposition questions for Dauzat and Goodwin	Deposition	300	1950
M. Bray	8/16/22	1	1	Drove from hotel to DWCC for depositions	DWCC Visits	300	300
M. Bray	8/16/22	5	5	Depositions of Vincent Coleman and Tyrone Mays	Deposition	300	1500
M. Bray	8/16/22	1	1	Drove from DWCC back to hotel	DWCC Visits	300	300
M. Bray	8/16/22	4	4	Drafting deposition questions for Dauzat and Goodwin	Deposition	300	1200
M. Bray	8/17/22	1	1	Drove from hotel to DWCC for depositions	DWCC Visits	300	300
M. Bray	8/17/22	6	6	Deposition of Dauzat and Sherman	Deposition	300	1800
M. Bray	8/17/22	1	1	Drove from DWCC back to hotel	DWCC Visits	300	300
M. Bray	8/17/22	1	1	Drafting questions for Goodwin, organizing documents	Deposition	300	300
M. Bray	8/17/22	0.5	0.5	Tested positive for Covid, emailed court reporter to cancel the rest of the week. Emailed counsel to cancel the rest of the week as well.	Staffing Matters	300	150
M. Bray	8/18/22	6	6	Drove from Ruston back to New Orleans	DWCC Visits	300	1800
M. Bray	8/18/22	1	1	Returned rental car at Enterprise	DWCC Visits	300	300
M. Bray	8/31/22	1	1	Reviewed and revised Second Joint Motion to Continue expert deadlines for DWCC and drafted a proposed order. Emailed back and forth with Keith to finalize and approve the final drafts, filed.	Motion to Continue	300	300
M. Bray	9/1/22	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	9/2/22	0.5	0.5	Preparing for Warden Goodwin's depo via Zoom	Deposition - Preparation	300	150
M. Bray	9/2/22	1	1	Marking exhibits from Warden Goodwin's depo, emailed link to Marcy and Keith	Deposition	300	300
M. Bray	9/8/22	1	1	Reviewing DWCC letters and approving responses to be mailed. Emailed Plum to let her know a number of letters are ready to be mailed and will let her know when more are ready.	Inmate Response Letters	300	300
M. Bray	9/15/22	0.5	0.5	Waited for them to bring class member CT for a visit before we were told we had to go back to the cellblocks for a visit with him. They took us to a no-contact space, which was wrong but we went ahead with the visit anyhow.	DWCC Visits	300	150
M. Bray	9/15/22	1	1	Met with CT.	DWCC Visits	300	300
M. Bray	9/15/22	1	1	Drove out from Camp C, checked out with front gate security.	DWCC Visits	300	300
M. Bray	9/18/22	0.5	0.5	Finished reviewing the DWCC letters and approving for mailing. Sent an email to Plum to let her know I reviewed everything and they're all ready to be mailed	Intake Letters	300	150
M. Bray	9/18/22	0.5	0.5	Pulling together the details about the Remedy RFPs and Interrogatories into a spreadsheet for Ron to review	Discovery	300	150
M. Bray	10/6/22	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	10/6/22	0.5	0.5	Drafted mass mailing letter to notify everyone of the Judge's verbal outline of her decision and emailed to the DWCC team for review	Mass Mailing	300	150
M. Bray	10/11/22	0.5	0.5	Reviewing draft of discovery following Defendants providing their descriptions of updates since June 30, 2022.	Discovery	300	150
M. Bray	10/11/22	0.5	0.5	Call with Dalton to discuss DWCC disco and other DWCC matters	Discovery	300	150
M. Bray	10/18/22	0.5	0.5	Met with Dalton and Plum	Case Management	300	150
M. Bray	10/20/22	0.5	0.5	Met with Dalton and Ron to discuss prep for the 30(b)(6).	30(b)(6) Deposition	300	150
M. Bray	10/27/22	1	1	DWCC Weekly Meeting	Case Management - Team Meeting	300	300
M. Bray	10/29/22	2	2	Adding info to the spreadsheet Analysis of Judge's Preliminary Ruling	Case Matters	300	600
M. Bray	11/1/22	1	1	Discussed DWCC with Dalton	Case Management	300	300
M. Bray	11/2/22	0.5	0.5	Spoke with Dalton about DWCC	Case Management	300	150
M. Bray	11/3/22	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	11/9/22	2	2	Meeting with experts for DWCC to discuss remedy recommendations in preparation for the 30(b)(6) depo on Tuesday	30(b)(6) Deposition	300	600
M. Bray	11/11/22	2	2	Depo prep with Ron for 30(b)(6)	Deposition - Preparation	300	600
M. Bray	11/12/22	1	1	Gathering documents for 30(b)(6) Deposition Preparation	Deposition - Preparation	300	300
M. Bray	11/15/22	5	5	30(b)(6) deposition of Ron on behalf of DRLA	Deposition	300	1500
M. Bray	11/16/22	0.5	0.5	Call with Craig Haney to discuss the scope of his report	Working with Experts	300	150
M. Bray	11/26/22	0.5	0.5	Reviewing Kathy Burns draft report	Working with Experts	300	150
M. Bray	11/26/22	0.5	0.5	Pulled prior Appendix A (Photos) from Craig's prior report and verified that all of those photos were referenced again in this report. Updated the heading on the appendix and emailed back to Craig for his final review.	Working with Experts	300	150
M. Bray	12/1/22	1	1	DWCC weekly meeting	Case Management - Team Meeting	300	300
M. Bray	12/1/22	0.5	0.5	Received a call from attorney representing an individual at DWCC. Discussed status of lawsuit and current conditions.	Client Communications	300	150
M. Bray	12/4/22	2	2	Drafted opposition to Def Mtn in Limine to admit new facts.	Motion in Limine	300	600
M. Bray	12/5/22	0.5	0.5	Drafting questions for Thompson deposition, reviewing Thompson's report to draft questions	Deposition	300	150
M. Bray	12/5/22	3	3	Drafting questions for Thompson deposition, reviewing Thompson's report to draft questions. Reviewing the exhibits attached to Thompson's report, adding questions as needed. Updating the chart of people that Thompson interviewed from previously to include the new information.	Deposition	300	900
M. Bray	12/13/22	0.5	0.5	Call with Dalton to discuss DWCC	Call/Discussion - Co-Counsel	300	150
M. Bray	12/14/22	0.5	0.5	Pulling exhibits together to send with draft pretrial order today	Trial Exhibits	300	150
M. Bray	12/14/22	3	3	Defended Deposition of Craig Haney	Deposition	300	900
M. Bray	12/14/22	3	3	Pulling exhibits together to send with draft pretrial order today	Trial Exhibits	300	900
M. Bray	12/14/22	0.5	0.5	Reviewing and finalizing the draft pretrial order and witness list. Created a Dropbox transfer link for the exhibits. Emailed to opposing counsel.	Trial Preparation	300	150
M. Bray	12/15/22	0.5	0.5	Prepared to take John Thompson's deposition. Reviewed my questions, pulled up the relevant PDFs.	Deposition - Preparation	300	150
M. Bray	12/21/22	1	1	Reviewing the updated chart Dalton put together pursuant to Minute Entry Rec Doc 652 for the policies for Kathy's report. Finalized the cover pleading and the updated chart and e-filed with WDLA. Downloaded and saved the filed documents to Dropbox.	Working with Experts	300	300
M. Bray	12/22/22	0.5	0.5	Preparing for Kathy Burns depositions	Deposition - Preparation	300	150
M. Bray	12/22/22	0.5	0.5	Call with class member AD.	Client Communications	300	150
M. Bray	12/22/22	0.5	0.5	Call with class member DO.	Client Communications	300	150
M. Bray	12/26/22	3.5	3.5	Creating summary sheets of class rev boards and MH Client Face Sheets as exhibits.	Trial Preparation	300	1050
M. Bray	12/27/22	2	2	Creating summary spreadsheets of exhibits for DWCC	Trial Exhibits	300	600
M. Bray	12/30/22	0.5	0.5	Reviewing the updates to the classification review board docs that Plum added to the sheet yesterday to finalize the summary exhibit	Trial Preparation	300	150
M. Bray	1/1/23	0.5	0.5	Reviewing draft opposition to Def Mtn in Limine to limit the scope of evidence at trial	Motion in Limine	300	150
M. Bray	1/2/23	1	1	Call with Dalton to discuss.	Vague	300	300
M. Bray	1/4/23	0.5	0.5	Met with Plum to discuss DWCC	Call/Discussion - Co-Counsel	300	150

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	1/4/23	0.5	0.5	Updated the JPTO with the latest agreement with Defendants to make P-N and DR-3 a joint exhibit. Made a few other final revisions and added the signature blocks to the JPTO, sent back to Defendants for final approval before I file. Also updated the joint witness list to correct the numbering and added signature blocks. Sent back to Defendants for their final approval before I file that under seal	Joint Pre Trial Conference (JPTO)	300	150
M. Bray	1/8/23	0.5	0.5	Met JT at the office to pick up all the boxes to go to the Court for DWCC.	Case Management	300	150
M. Bray	1/8/23	0.5	0.5	Reviewing and revising pretrial FFCL	FFCL	300	150
M. Bray	1/9/23	0.5	0.5	Reviewing and revising pretrial FFCL	FFCL	300	150
M. Bray	1/9/23	0.5	0.5	Met with Dalton to discuss DWCC and our current to do list	Case Management - Planning	300	150
M. Bray	1/9/23	0.5	0.5	Created PDFs of the FFCL, Objection and Witness List. E-filed in WDLA. Downloaded filed does and saved to Dropbox.	FFCL	300	150
M. Bray	1/10/23	2	2	Meeting with Dalton to plan for witnesses for trial for DWCC	Trial Preparation	300	600
M. Bray	1/10/23	3	3	Drafting questions for prisoners so PJI can prep them.	Trial Preparation	300	900
M. Bray	1/10/23	1	1	Drafting questions for Burgos	Trial Preparation	300	300
M. Bray	1/11/23	0.5	0.5	Arrived at the office and set up for the pretrial conference with Judge Foote today at 9:30	Pre-Trial Conference	300	150
M. Bray	1/11/23	1	1	Reviewed depositions in lieu and calculated the lines and the time for each side for each depo to have an idea of how much time each side used in case the Court asks. Emailed the calculations to Defendants for their verification before we notify the court.	Deposition	300	300
M. Bray	1/11/23	1	1	Reviewed info about updated facts from Defendants, reviewed questions for prisoners and updated	Trial Preparation	300	300
M. Bray	1/12/23	4	4	Drafting trial questions for DWCC	Trial Preparation	300	1200
M. Bray	1/13/23	2	2	Drove to Adams and Reese with Dalton and Plum to pick up our badges, parking passes and see the room we will be in for trial. Met with Berkley to go over the tech for trial. Discussed some logistics with Jamie. Drove back to the office	Trial Preparation	300	600
M. Bray	1/14/23	6	6	Drafting questions for remedy trial	Trial Preparation	300	1800
M. Bray	1/15/23	3.5	3.5	Drafting questions for remedy trial	Trial Preparation	300	1050
M. Bray	1/15/23	6.5	6.5	Drafting questions for remedy trial	Trial Preparation	300	1950
M. Bray	1/16/23	2	2	Drafting questions for remedy trial	Trial Preparation	300	600
M. Bray	1/16/23	1	1	Call with Kathy Burns to prepare for her testimony	Working with Experts	300	300
M. Bray	1/16/23	1	1	Call with all experts before the start of remedy trial	Trial Preparation	300	300
M. Bray	1/17/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to file our response to Def objection to the Vera Report	Block Billing	300	300
M. Bray	1/17/23	2	2	Polishing Burgos line of questions to be ready for tomorrow	Trial Preparation	300	600
M. Bray	1/18/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	300
M. Bray	1/18/23	2	2	Adding final questions to Hayden outline.	Working with Experts	300	600
M. Bray	1/19/23	0.5	0.5	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	150
M. Bray	1/20/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	300
M. Bray	1/21/23	0.5	0.5	Drafting outline questions for trial	Trial Preparation	300	150
M. Bray	1/21/23	2	2	Drafting outline questions for trial	Trial Preparation	300	600
M. Bray	1/22/23	1	1	Drafting outline questions for trial	Trial Preparation	300	300
M. Bray	1/22/23	4	4	Drafting outline questions for trial	Trial Preparation	300	1200
M. Bray	1/23/23	2	2	Reviewing lines of questions for the next few witnesses to make sure the outlines are ready.	Trial Preparation	300	600
M. Bray	1/24/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	300
M. Bray	1/25/23	2	2	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	600
M. Bray	1/26/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	300
M. Bray	1/27/23	4.5	4.5	Drafting questions for trial, Robinson and Haney	Trial Preparation	300	1350
M. Bray	1/29/23	9	9	Drafting questions for trial, preparing for cross	Trial Preparation	300	2700
M. Bray	1/30/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	300
M. Bray	2/1/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300	300
M. Bray	2/2/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Reviewed to do list.	Block Billing	300	300
M. Bray	2/3/23	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Reviewed to do list.	Block Billing	300	300
M. Bray	6/20/23	1	1	Researching and drafting Opposition to Def Mtn to Supp for DWCC	Motion to Supplement	300	300
M. Bray	6/21/23	0.5	0.5	Met with Plum to discuss DWCC incoming letters	Intake Letters	300	150
M. Bray	6/23/23	1	1	Drafting opp to mtn to supp for DWCC	Case Management	300	300
M. Bray	7/3/23	0.5	0.5	Call with Dalton	Vague	300	150
M. Bray	7/11/23	0.5	0.5	Reading Def Reply to Opp to Mtn to Supp for DWCC	Motion to Supplement	300	150
M. Bray	10/3/23	0.5	0.5	Call with niece of DWCC class member	Client Communications	300	150
M. Bray	10/3/23	0.5	0.5	Discussed DWCC generally with Dalton	Call/Discussion - Co-counsel	300	150
M. Bray	11/7/23	1	1	Reviewing and revising draft MISO attorney fees for DWCC	Motion for Attorney Fees	300	300
M. Bray	11/7/23	2	2	Ran a report for time from 4/1/22 through 11/1/23, organized the time records by employee. Began reviewing total time for Trunnell to pull from all sources to create one master spreadsheet for his time. Will need to do the same thing for each former employee, then current employees through 11/1/23 because remainder of time will be finalized after we receive the order.	Staffing Matters	300	600

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	11/8/23	0.5	0.5	Reviewing total time for Trunnell for MISO attorney fees. Sorted all time from DAD for only DWCC time for Trunnell, Bray and Lospennato.	Motion for Attorney Fees	300	150
M. Bray	11/9/23	1	1	Pulling time report from the Filemaker DAD data for DWCC time	Time Sheets	300	300
M. Bray	3/13/24	3	3	Defendants filed a motion to reopen the record to introduce new facts again for DWCC. Printed the MISO and reviewed.	Motion to Reopen the Record	300	900
M. Bray	4/1/24	3	3	Redrafting response to DWCC motion to supplement with current conditions. Shared the Google Doc with Dalton so he can work on it tomorrow when I'm out of town for my hearing.	Motion to Supplement	300	900
M. Bray	4/3/24	2	2	Finalized memo in opp for DWCC and filed.	Memo in Opposition	300	600
M. Bray	4/10/24	0.5	0.5	Call with Dalton re. DWCC	Call/Discussion - Co-counsel	300	150
M. Bray	4/10/24	0.5	0.5	Reviewing Def Response to our opposition for DWCC and making my notes	Case Management	300	150
M. Bray	4/13/24	0.5	0.5	Reviewed emails and other info to answer some of my own questions for the Surreply for DWCC. Made a few revisions. Shared with Dalton so he can review on Monday.	Sur-Reply	300	150
M. Bray	4/15/24	1	1	Reviewing and revising the Surreply for DWCC; reviewing and accepting Dalton's revisions	Sur-Reply	300	300
M. Bray	5/21/24	0.5	0.5	Discussed scheduling regular calls to prisoners at DWCC with Dalton.	Case Management - Planning	300	150
M. Bray	5/24/24	0.5	0.5	Defendants filed a supplemental motion for leave to submit additional new facts. Downloaded the ECFs to Dropbox and printed to review. Discussed with Dalton	Motion for Leave	300	150
M. Bray	6/3/24	0.5	0.5	Call with father regarding his son at DWCC	Client Communications - Relative	300	150
M. Bray	7/3/24	0.5	0.5	Discussed DWCC with Dalton and Plum.	Call/Discussion - Co-counsel	300	150
M. Bray	7/19/24	1	1	DWCC calls with 3 prisoners	Client Communications	300	300
M. Bray	7/19/24	2	2	Reading DWCC Remedy decision	Court Order	300	600
M. Bray	7/19/24	1	1	DWCC calls with 3 prisoners	Client Communications	300	300
M. Bray	7/19/24	1	1	Call with Dalton and Katie, drafted press release for DWCC remedy. Emailed to contacts.	Case Management - Public Relations	300	300
M. Bray	7/19/24	2	2	Reading DWCC Remedy decision	Court Order	300	600
M. Bray	7/26/24	3.5	3.5	Drafting motion for attorney fees and costs for DWCC	Motion for Attorney Fees	300	1050
M. Bray	7/31/24	2	2	Drafting motion for attorney fees and costs for DWCC	Motion for Attorney Fees	300	600
M. Bray	8/8/24	1	1	Call with Dalton and Plum to touch base re. DWCC motion for fees and costs	Motion for Attorney Fees	300	300
M. Bray	8/8/24	5	5	Revising motion for fees and costs for DWCC	Motion for Attorney Fees	300	1500
M. Bray	8/11/24	1	1	Reviewing time for DWCC	Motion for Attorney Fees	300	300
M. Bray	8/12/24	0.5	0.5	Downloading and saving the invoices for Bellweather and Hyphen for the data entry for DWCC	Case Management - Administrative Tasks	300	150
M. Bray	8/12/24	2	2	Organizing the costs and expenses for DWCC into a single spreadsheet. Updating the totals and creating a chart for the total categories.	Motion for Attorney Fees	300	600
M. Bray	8/13/24	5.5	5.5	Drafting MISO attorney fees and costs. Gathering information for costs and expenses, reviewing fees.	Motion for Attorney Fees	300	1650
M. Bray	8/13/24	1	1	Drafting MISO attorney fees and costs. Gathering information for costs and expenses, reviewing fees.	Motion for Attorney Fees	300	300
M. Bray	8/14/24	0.5	0.5	Call with Katie re. DWCC motion for fees and costs	Motion for Attorney Fees	300	150
M. Bray	8/14/24	1	1	Reviewing edits to MISO attorney fees for DWCC and making revisions	Motion for Attorney Fees	300	300
M. Bray	8/15/24	3.5	3.5	Drafting my declaration for the motion for attorney fees for DWCC	Motion for Attorney Fees	300	1050
M. Bray	8/15/24	1	1	Drafting my declaration for the motion for attorney fees for DWCC	Motion for Attorney Fees	300	300
M. Bray	8/16/24	0.5	0.5	Finalizing time records for fee motion for DWCC	Motion for Attorney Fees	300	150
M. Bray	8/16/24	0.5	0.5	Discussed fee and cost motion with Dalton	Motion for Attorney Fees	300	150
J. Trunnell	12/3/17	3.5	3.5	Revisions to MISO Class Cert	Motion for Class Certification	300	1050
J. Trunnell	12/9/17	7.5	7.5	Review of progress on complaint draft, revisions	Complaint	300	2250
J. Trunnell	12/13/17	8	8	Complaint drafting	Complaint	300	2400
J. Trunnell	12/13/17	2	2	meeting with preparation and debrief	Vague	300	600
J. Trunnell	12/16/17	3	3	Complaint drafting	Complaint	300	900
J. Trunnell	12/18/17	3.5	3.5	Complaint drafting, submitted to group.	Complaint	300	1050
J. Trunnell	12/19/17	7.5	7.5	Drafting MISO Class Cert	Motion for Class Certification	300	2250
J. Trunnell	12/20/17	7.5	7.5	7.5 drafting MISO Class Cert	Motion for Class Certification	300	2250
J. Trunnell	12/20/17	1	1	1 preparation for	Incomplete time entry	300	300
J. Trunnell	12/21/17	6	6	6 drafting MISO Class Cert,	Motion for Class Certification	300	1800
J. Trunnell	12/23/17	8	8	MISO Class Cert Drafting	Motion for Class Certification	300	2400
J. Trunnell	12/25/17	2.5	2.5	MISO Class Cert Drafting	Motion for Class Certification	300	750
J. Trunnell	12/27/17	8	8	MISO Class Cert Drafting w/ brief meeting	Motion for Class Certification	300	2400
J. Trunnell	12/28/17	6.5	6.5	MISO Class Cert Drafting w/ brief meeting	Motion for Class Certification	300	1950
J. Trunnell	12/29/17	7	7	MISO Class Cert Drafting	Motion for Class Certification	300	2100
J. Trunnell	12/31/17	10.5	10.5	MISO Class Cert Drafted and circulated to group	Motion for Class Certification	300	3150
J. Trunnell	1/2/18	6.5	6.5	Travel to DWCC	DWCC Visits - Travel	300	1950
J. Trunnell	1/3/18	9	9	Client meetings	Client Meetings	300	2700
J. Trunnell	1/4/18	9	9	Client meetings	Client Meetings	300	2700
J. Trunnell	1/4/18	6	6	travel home	DWCC Visits - Travel	300	1800
J. Trunnell	1/5/18	1	1	Debrief meeting	Vague	300	300
J. Trunnell	1/5/18	3.5	3.5	revisions to Complaint	Complaint	300	1050
J. Trunnell	1/6/18	6.5	6.5	Revisions to complaint.	Complaint	300	1950
J. Trunnell	1/10/18	2	2	meeting on correspondence and planning	Case Management - Planning	300	600
J. Trunnell	1/10/18	5.5	5.5	Research on mail tampering issue	Legal Research	300	1650
J. Trunnell	1/11/18	4	4	Fact research on mail tampering, notes from tier interviews.	Legal Research	300	1200
J. Trunnell	1/12/18	0.5	0.5	discussion of draft comments with RKL	Call/Discussion - Co-Counsel	300	150
J. Trunnell	1/12/18	4	4	review and edits to TRO motion	TRO	300	1200
J. Trunnell	1/19/18	1.5	1.5	Meeting re case status and staffing.	Case Management - Staffing	300	450
J. Trunnell	1/24/18	2	2	Meeting re DWCC (2hr)	DWCC Visits	300	600
J. Trunnell	1/25/18	1.5	1.5	Meeting re ethical obligations	Ethics Advisory	300	450
J. Trunnell	1/25/18	2.5	2.5	Revisions to main complaint	Complaint	300	750
J. Trunnell	1/30/18	2.5	2.5	Last minute check of releases, documents for questions, and interview prep	DWCC Visits - Preparation	300	750
J. Trunnell	1/31/18	4	4	9am - 1pm: Client meetings	Client Meetings	300	1200
J. Trunnell	2/1/18	1.5	1.5	9:15 - 10:45: client interviews	DWCC Visits	300	450
J. Trunnell	2/1/18	1.5	1.5	12 - 1:30 - Travel home	EHCC Visits	300	450
J. Trunnell	2/7/18	2.5	2.5	Weekly intake meeting w/ 2 week backlog	Case Management - Team Meeting	300	750
J. Trunnell	2/7/18	2	2	Research and clarification for 1st Amendment complaint.	Complaint	300	600
J. Trunnell	2/12/18	0.5	0.5	Call to discuss next steps	Complaint	300	150
J. Trunnell	2/14/18	2.5	2.5	Edits to preservation order.	Preservation Suit	300	750
J. Trunnell	2/19/18	5.5	5.5	Final preparations for filing. All documents organized and double checked. 5.5	Complaint	300	1650
J. Trunnell	2/19/18	1	1	Final call with co-counsel before maternity leave	Call/Discussion - Co-Counsel	300	300
J. Trunnell	2/20/18	2.5	2.5	Complaint, motion for class cert, and TRO filed	Complaint	300	750
J. Trunnell	2/20/18	0.5	0.5	ECF record-keeping	Case Management - Document Management	300	150
J. Trunnell	2/21/18	2.5	2.5	TRO moots	TRO Moot	300	750
J. Trunnell	2/21/18	2	2	Consultation with Miranda on litigation against joint AG/DoC team	Call/Discussion - Co-Counsel	300	600

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	2/22/18	1.5	1.5	Moot of TRO with team, featuring Susan Meyers.	TRO Moot	300	450
J. Trunnell	2/22/18	2.5	2.5	Expert witness selection correspondence.	Case Management - Experts	300	750
J. Trunnell	2/23/18	0.5	0.5	Correspondence with J Vining re visit to DWCC.	Correspondence - Opposing Counsel	300	150
J. Trunnell	2/23/18	0.5	0.5	Ethics research and consultation w/ Sarah re asking for waiver of service.	Legal Research	300	150
J. Trunnell	2/25/18	4.5	4.5	Preparation and mootng for TRO arguments.	TRO Moot	300	1350
J. Trunnell	2/26/18	0.5	0.5	Attending status conference.	Status Conference	300	150
J. Trunnell	2/26/18	3.5	3.5	Travel to and from BR.	TRO Hearing - Travel	300	1050
J. Trunnell	2/27/18	0.5	0.5	Review of order by Judge Dick on Angola prison litigation.	Angola Order Review	300	150
J. Trunnell	2/27/18	1.5	1.5	Review of publications and documents by potential expert witness.	Case Management - Experts	300	450
J. Trunnell	3/1/18	5.5	5.5	Travel to DWCC.	DWCC Visits - Travel	300	1650
J. Trunnell	3/2/18	7.5	7.5	Travel back to New Orleans.	DWCC Visits - Travel	300	2250
J. Trunnell	3/2/18	7	7	Client meetings.	DWCC Visits	300	2100
J. Trunnell	3/4/18	4.5	4.5	Review of opposition and Motion to Transfer Venue. Beginning outlines of responses.	Motion to Transfer Venue	300	1350
J. Trunnell	3/6/18	7	7	Finalizing response to opposition to TRO.	TRO	300	2100
J. Trunnell	3/8/18	3	3	Drafting memorandum on expectations of expert witnesses on subject areas.	Case Management - Experts	300	900
J. Trunnell	3/9/18	1.5	1.5	Review of motion to strike	Motion to Strike Affidavits	300	450
J. Trunnell	3/9/18	0.5	0.5	Organizing folder of ECF documents.	Case Management - Document Management	300	150
J. Trunnell	3/11/18	1.5	1.5	Research on 1404 cases for opposition.	Legal Research	300	450
J. Trunnell	3/12/18	6.5	6.5	Drafting opposition to Motion to Transfer Venue, research on difference between Boyd and Fifth Circuit.	Motion to Transfer Venue	300	1950
J. Trunnell	3/14/18	5.5	5.5	Drafting opposition.	Motion to Transfer Venue	300	1650
J. Trunnell	3/14/18	1.5	1.5	Weekly standing meeting on mail.	Case Management - Team Meeting	300	450
J. Trunnell	3/15/18	8.5	8.5	Travel up to Minden. Traffic was bad.	DWCC Visits - Travel	300	2550
J. Trunnell	3/16/18	7	7	Drive back to New Orleans.	DWCC Visits - Travel	300	2100
J. Trunnell	3/19/18	0.5	0.5	Meeting with Melanie Bray and review of view.	Call/Discussion - Co-Counsel	300	150
J. Trunnell	3/20/18	0.5	0.5	Review of research on Hancey's cases.	Case Management - Experts	300	150
J. Trunnell	3/20/18	2.5	2.5	Review of edits by MB and SV, responding to comments, forwarding draft to Ron.	Vague	300	750
J. Trunnell	3/21/18	3.5	3.5	Review of 1404 cases, looking for cases opposition is likely to use.	Legal Research	300	1050
J. Trunnell	3/22/18	8.5	8.5	Revising opposition, including additional crosswalk of complaint allegations.	Complaint	300	2550
J. Trunnell	3/26/18	2.5	2.5	Review of Memo in Opposition of motion to strike. Legal research on same.	Motion to Strike Affidavits	300	750
J. Trunnell	3/28/18	1	1	Weekly intake meeting, attended by phone due.	Case Management - Team Meeting	300	300
J. Trunnell	4/3/18	1.5	1.5	Review of reply to filing in opposition.	Case Management	300	450
J. Trunnell	4/4/18	1	1	Drafting memo on supplemental info to TRO filing.	TRO	300	300
J. Trunnell	4/4/18	1.5	1.5	Weekly intake meeting	Case Management - Team Meeting	300	450
J. Trunnell	4/6/18	4.5	4.5	Drafting supplemental memo on video evidence.	Evidentiary Issues - Security Camera Videos	300	1350
J. Trunnell	4/10/18	1	1	Meeting with SV and MB on FRCP 26 conference.	Discovery	300	300
J. Trunnell	4/12/18	2.5	2.5	Meeting on Rule 26 requirements, planning calendar proposal.	Discovery	300	750
J. Trunnell	4/13/18	1.5	1.5	Draft revisions on supplemental reply on TRO/PI.	TRO	300	450
J. Trunnell	4/15/18	1	1	Revisions to supplement on TRO.	TRO	300	300
J. Trunnell	4/19/18	1	1	Review of order, discussion of possible avenues of appeal	Case Matters	300	300
J. Trunnell	4/23/18	2.5	2.5	Preparation of draft scheduling order for opposing counsel to review. Sent draft to opposing counsel.	Scheduling Order	300	750
J. Trunnell	4/26/18	0.5	0.5	Discussion on response to unprofessional conduct by opposing counsel. Affirming conduct expectations during litigation with management. Review of proposal by RKL for response letter.	Case Matters	300	150
J. Trunnell	4/26/18	1.5	1.5	Weekly case intake meeting.	Case Management - Team Meeting	300	450
J. Trunnell	4/29/18	1.5	1.5	Reorganizing paragraphs of TRO consolidated filing.	TRO	300	450
J. Trunnell	5/1/18	1.5	1.5	Review of files and preparation for client visit.	DWCC Visits - Preparation	300	450
J. Trunnell	5/3/18	6.5	6.5	8:15-2:45 Client visits	DWCC Visits	300	1950
J. Trunnell	5/3/18	3	3	Travel to and from DWCC	DWCC Visits - Travel	300	900
J. Trunnell	5/4/18	0.5	0.5	Conferring with SV and MB on video confidentiality.	Evidentiary Issues - Security Camera Videos	300	150
J. Trunnell	5/7/18	3.5	3.5	Video supplemental filing draft and editing.	Evidentiary Issues - Security Camera Videos	300	1050
J. Trunnell	5/9/18	0.5	0.5	Attending status conference.	Status Conference	300	150
J. Trunnell	5/14/18	0.5	0.5	Edits to Opposition to Motion to Strike	Motion to Strike Affidavits	300	150
J. Trunnell	5/18/18	0.5	0.5	Emergency correspondence assessment re suicide watches and attacks.	Case Management	300	150
J. Trunnell	5/21/18	5.5	5.5	Travel up to Minden.	DWCC Visits - Travel	300	1650
J. Trunnell	5/22/18	7	7	Prisoner interviews.	DWCC Visits	300	2100
J. Trunnell	5/23/18	0.5	0.5	Call to Slate Tech re PI hearing dates and content.	Preliminary Injunction	300	150
J. Trunnell	5/24/18	1.5	1.5	Weekly intake meeting.	Case Management - Team Meeting	300	450
J. Trunnell	5/30/18	0.5	0.5	Meeting with RKL, SV, and MB before conference call. (0.5)	Status Conference - Preparation	300	150
J. Trunnell	5/30/18	0.5	0.5	Debrief after conference call (0.5)	Status Conference - Debrief	300	150
J. Trunnell	5/31/18	2	2	Weekly intake meeting, case work assignments to get ready for PI hearing.	Case Management - Team Meeting	300	600
J. Trunnell	6/4/18	2.5	2.5	Meeting with MB to set up detailed witness chart.	Preliminary Injunction	300	750
J. Trunnell	6/5/18	1.5	1.5	Research on motion in limine.	Motion in Limine	300	450
J. Trunnell	6/5/18	0.5	0.5	Call with expert witness.	Working with Experts	300	150
J. Trunnell	6/7/18	2.5	2.5	Preparation of witness questioning.	Preliminary Injunction	300	750
J. Trunnell	6/7/18	1.5	1.5	Case intake meeting.	Case Management - Team Meeting	300	450
J. Trunnell	6/8/18	7.5	7.5	Final preparation on RFP, initial disclosures, and documents to expert witness.	RFP	300	2250
J. Trunnell	6/12/18	4.5	4.5	Review of Katie's motion in limine, cite checking, modifying for DWCC.	Motion in Limine	300	1350
J. Trunnell	6/12/18	0.5	0.5	Supervisory meeting w/ intern re legal research on body cameras and motion in limine.	Motion in Limine	300	150
J. Trunnell	6/13/18	0.5	0.5	Correspondence with experts re visit to DWCC schedule.	Working with Experts	300	150
J. Trunnell	6/14/18	1.5	1.5	Review of video, discussion on which to include as exhibits.	Evidentiary Issues - Security Camera Videos	300	450
J. Trunnell	6/14/18	3.5	3.5	Preparation on witnesses and exhibit list.	Preliminary Injunction	300	1050
J. Trunnell	6/18/18	0.5	0.5	Review of granted writs.	Writ of Habeas Corpus	300	150
J. Trunnell	6/20/18	5.5	5.5	Opening argument preparation.	Preliminary Injunction	300	1650
J. Trunnell	6/22/18	4	4	Mooting PI hearing.	Preliminary Injunction	300	1200
J. Trunnell	6/25/18	6.5	6.5	Travel to Minden.	DWCC Visits - Travel	300	1950
J. Trunnell	6/26/18	2.5	2.5	Revisions to Direct and Cross exams	Preliminary Injunction	300	750
J. Trunnell	6/26/18	9	9	8:30-5:30, interviews at DWCC	DWCC Visits	300	2700
J. Trunnell	6/28/18	7	7	Travel home	Preliminary Injunction Hearing - Travel	300	2100
J. Trunnell	7/2/18	5.5	5.5	First draft of Supplemental Brief.	Preliminary Injunction Supplemental Brief	300	1650
J. Trunnell	7/3/18	2.5	2.5	Weekly strategy and intake meeting.	Case Management - Team Meeting	300	750
J. Trunnell	7/3/18	0.5	0.5	Call to Miranda Tait re record keeping and case involvement.	Case Management - Staffing	300	150
J. Trunnell	7/9/18	3.5	3.5	Research re Supplemental memo addressing relevance concerns.	Legal Research	300	1050
J. Trunnell	7/11/18	7.5	7.5	Edits and revisions to Supplemental Memo.	Preliminary Injunction	300	2250
J. Trunnell	7/19/18	1.5	1.5	Review of notes re interviewees.	DWCC Visits	300	450
J. Trunnell	7/19/18	0.5	0.5	Review of defendants discovery set one.	Discovery	300	150
J. Trunnell	7/23/18	1.5	1.5	Review of MBray's research and notes re Def's Set 1.	Legal Research	300	450
J. Trunnell	7/23/18	2	2	Meeting on Def's Discovery Set 1.	Discovery	300	600

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	7/25/18	1.5	1.5	Printing, organizing, and preparation to discuss discovery with Plaintiffs.	Discovery	300	450
J. Trunnell	7/25/18	6.5	6.5	Transit up to Minden.	DWCC Visits - Travel	300	1950
J. Trunnell	7/26/18	9.5	9.5	Interviews at DWCC.	DWCC Visits	300	2850
J. Trunnell	7/29/18	4.5	4.5	Redrafting letter regarding access authority specific to death investigations.	TH Death Investigation	300	1350
J. Trunnell	7/30/18	2	2	Research on PI on merits of heat issue under PLRA.	Preliminary Injunction	300	600
J. Trunnell	7/30/18	0.5	0.5	Discovery software setup.	Case Management - Document Management	300	150
J. Trunnell	8/2/18	1.5	1.5	Review of case strategy, chart for discovery RFA.	Discovery	300	450
J. Trunnell	8/3/18	0.5	0.5	Drafting motion and proposed order on leave to file.	Motion for Leave to File	300	150
J. Trunnell	8/6/18	2.5	2.5	Revisions and research on draft of request to supplement first RFP.	RFP	300	750
J. Trunnell	8/8/18	1	1	Site visit notice and correspondence to experts.	Working with Experts	300	300
J. Trunnell	8/8/18	0.5	0.5	RFP research and pulling document off of former laptop.	RFP	300	150
J. Trunnell	8/9/18	0.5	0.5	Call from Coroner's office, typing up notes.	TH Death Investigation	300	150
J. Trunnell	8/9/18	4.5	4.5	Investigation into legal significance and practical consequences of refusing to give body to a coroner.	TH Death Investigation	300	1350
J. Trunnell	8/10/18	2.5	2.5	Outline notes for interrogatories.	Discovery	300	750
J. Trunnell	8/13/18	7	7	10:30-1, travel to Lafayette. 230-7, travel to Minden.	DWCC Visits - Travel	300	2100
J. Trunnell	8/14/18	4.5	4.5	8:30-1 Interviews (Bruce Charles arrived 940, technical difficulties on Defendants' side)	DWCC Visits	300	1350
J. Trunnell	8/16/18	0.5	0.5	Drafting questions to bar ethics board.	Legal Research	300	150
J. Trunnell	8/17/18	0.5	0.5	Drafting email to opposing counsel	Correspondence - Opposing Counsel	300	150
J. Trunnell	8/18/18	3.5	3.5	Drafting proposed filing requesting emergency status conference.	Status Conference	300	1050
J. Trunnell	8/19/18	6.5	6.5	Catch-up on memos.	DWCC Visit Memos	300	1950
J. Trunnell	8/22/18	1.5	1.5	Final review of RFP 4 and Interrogatory 3.	Discovery	300	450
J. Trunnell	8/23/18	4.5	4.5	Drafting reply brief to opposition to motion for protective order.	Motion for Protective Order	300	1350
J. Trunnell	8/24/18	3.5	3.5	Preparation for trip up to DWCC. Review of preservation order to both experts.	DWCC Visits - Preparation	300	1050
J. Trunnell	8/27/18	7.5	7.5	8:30-4, DWCC walkthroughs, record review during expert client interviews.	DWCC Visits	300	2250
J. Trunnell	8/27/18	1	1	6-7 debrief and meeting	Case Management	300	300
J. Trunnell	8/29/18	7	7	830-330 Record reviews during expert visit.	DWCC Visits	300	2100
J. Trunnell	8/30/18	1.5	1.5	Intake and case meeting.	Case Management - Team Meeting	300	450
J. Trunnell	9/5/18	6.5	6.5	Edits and circulating Objections to R&R.	Objection to Report & Recommendations	300	1950
J. Trunnell	9/7/18	1.5	1.5	Drafting RFP.	RFP	300	450
J. Trunnell	9/10/18	0.5	0.5	Meeting with Ron re case plan and budget.	Case Management - Planning	300	150
J. Trunnell	9/13/18	0.5	0.5	Meeting to discuss discovery status.	Discovery	300	150
J. Trunnell	9/13/18	0.5	0.5	Call from C. Duane Johnson's mother, he has been moved to general population.	Client Communications - Relative	300	150
J. Trunnell	9/13/18	2	2	Weekly intake and case planning meeting.	Case Management - Team Meeting	300	600
J. Trunnell	9/14/18	0.5	0.5	Review of discovery supplement requests.	Discovery	300	150
J. Trunnell	9/14/18	2.5	2.5	Research and prep for discovery disputes in 1st Supplement.	Discovery	300	750
J. Trunnell	9/17/18	1.5	1.5	Edits to 2nd supplement to RFP 1, sending to opposing counsel.	RFP	300	450
J. Trunnell	9/17/18	0.5	0.5	Review of response to Defendants' second interrogatory and RFP.	Discovery	300	150
J. Trunnell	9/19/18	1	1	Meeting with Melanie Bray and Katie S regarding their deficiency letter.	Discovery	300	300
J. Trunnell	9/19/18	1.5	1.5	Review of correspondence and creating checklist for phone call to opposing counsel.	Call/Email - Opposing Counsel	300	450
J. Trunnell	9/19/18	0.5	0.5	Compiling visitation list and correspondence with opposing counsel.	Correspondence - Opposing Counsel	300	150
J. Trunnell	9/20/18	3.5	3.5	Research and preparation of draft for possibility of filing motions to compel and for continuance.	Motion to Compel	300	1050
J. Trunnell	9/23/18	6.5	6.5	Commute up to Homer.	Travel	300	1950
J. Trunnell	9/23/18	0.5	0.5	Hardware setup and testing.	Case Management - Technology Issues	300	150
J. Trunnell	9/24/18	6.5	6.5	Interviews with clients	DWCC Visits	300	1950
J. Trunnell	9/24/18	0.5	0.5	Meeting with KS to discuss outstanding discovery.	Discovery	300	150
J. Trunnell	9/24/18	0.5	0.5	Meeting with KS, discussing morning interviews and discovery.	Discovery	300	150
J. Trunnell	9/25/18	7.5	7.5	Client interviews and arranging transfer of video.	DWCC Visits	300	2250
J. Trunnell	9/27/18	2.5	2.5	Weekly intake and strategy meeting.	Case Management - Team Meeting	300	750
J. Trunnell	9/28/18	4.5	4.5	Motion to compel, motion for continuance.	Motion to Compel	300	1350
J. Trunnell	9/28/18	0.5	0.5	Updates from Melanie regarding relationship between Coroner's office and LA Forensics.	TH Death Investigation	300	150
J. Trunnell	10/1/18	3.5	3.5	Review and prep of objections to expert note discovery.	Working with Experts	300	1050
J. Trunnell	10/4/18	2	2	Weekly intake meeting.	Case Management - Team Meeting	300	600
J. Trunnell	10/11/18	0.5	0.5	Review of weekly letters.	Intake Letters	300	150
J. Trunnell	10/15/18	7	7	Client interviews 9-4	DWCC Visits	300	2100
J. Trunnell	10/17/18	1.5	1.5	DWCC weekly meeting. Discovery motions discussed and assigned. Updates on client status and interview results.	Case Management - Team Meeting	300	450
J. Trunnell	10/23/18	1.5	1.5	Final edits, formatting and filing reply to opposition.	Case Management	300	450
J. Trunnell	10/24/18	2.5	2.5	Edits to opposition to motion to compel.	Motion to Compel	300	750
J. Trunnell	10/25/18	6.5	6.5	Edits and research on memo opposing D's MTC.	Motion to Compel	300	1950
J. Trunnell	10/26/18	2	2	Weekly intake meeting and follow up discussion regarding co-counsel meeting.	Case Management - Team Meeting	300	600
J. Trunnell	10/29/18	7	7	Meeting with Ed Aro to discuss DWCC case and strategy in relationship to ADX.	Case Management - Planning	300	2100
J. Trunnell	11/1/18	4.5	4.5	Document review, 15486-15860	DWCC Doc Review	300	1350
J. Trunnell	11/2/18	1.5	1.5	Staff meeting on case plan.	Case Management - Planning	300	450
J. Trunnell	11/2/18	0.5	0.5	Debrief on expert call and possible new discovery requests.	Working with Experts	300	150
J. Trunnell	11/8/18	1.5	1.5	Weekly case meeting.	Case Management - Team Meeting	300	450
J. Trunnell	11/12/18	2.5	2.5	Edits to request to supplement re RFP3.	RFP	300	750
J. Trunnell	11/14/18	1.5	1.5	Contact memo backlog	Case Management	300	450
J. Trunnell	11/15/18	0.5	0.5	Interview topic prep for visit to DWCC.	DWCC Visits	300	150
J. Trunnell	11/16/18	0.5	0.5	Call to Bruce's aunt and grandmother re securus issues.	Client Communications - Relative	300	150
J. Trunnell	11/16/18	0.5	0.5	Attending status conference.	Status Conference	300	150
J. Trunnell	11/16/18	1	1	Preparation for status conference.	Status Conference	300	300
J. Trunnell	11/18/18	6.5	6.5	Travel to minden.	DWCC Visits	300	1950
J. Trunnell	11/20/18	5.5	5.5	8:30-2 - Client interviews	DWCC Visits	300	1650
J. Trunnell	11/29/18	2	2	Weekly intake.	Case Management - Team Meeting	300	600
J. Trunnell	12/1/18	3	3	Attending PAIMI council meeting.	Vague	300	900
J. Trunnell	12/6/18	1.5	1.5	Weekly intake meeting.	Case Management - Team Meeting	300	450
J. Trunnell	12/12/18	1.5	1.5	Memo catch up.	Case Management	300	450
J. Trunnell	12/13/18	0.5	0.5	Correspondence with expert.	Working with Experts	300	150
J. Trunnell	12/13/18	2.5	2.5	Finalizing motion to compel for distribution.	Motion to Compel	300	750
J. Trunnell	1/9/19	3.5	3.5	Last edits to reply brief, adding more research and citations.	Case Management	300	1050
J. Trunnell	1/15/19	3	3	Continuing work on preparation of doc review plan, fact proof chart	Trial Preparation	300	900
J. Trunnell	1/17/19	4.5	4.5	Developing fact proof chart and deposition assignments	Deposition - Preparation	300	1350
J. Trunnell	1/18/19	2.5	2.5	Finalizing case planning for deposition stage.	Deposition - Preparation	300	750
J. Trunnell	1/21/19	6	6	Travel to Minden.	DWCC Visits - Travel	300	1800
J. Trunnell	1/22/19	7	7	3:30-11pm Travel home. Minus half hour for dinner.	DWCC Visits - Travel	300	2100
J. Trunnell	1/22/19	6	6	8:30-3:30 Interviews at DWCC.	DWCC Visits	300	1800
J. Trunnell	1/24/19	4.5	4.5	Document review: medical and MH records.	DWCC Doc Review	300	1350
J. Trunnell	1/25/19	0.5	0.5	Drafting letter to opposing counsel.	Correspondence - Opposing Counsel	300	150

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	1/25/19	0.5	0.5	Review of RecDoc 139, Motion to Communicate with our class members.	Motion to Communicate	300	150
J. Trunnell	1/25/19	1.5	1.5	Case meeting.	Case Management	300	450
J. Trunnell	1/26/19	1.5	1.5	Presentation to Advocacy Center board regarding litigation progress in DWCC.	Case Management	300	450
J. Trunnell	2/6/19	0.5	0.5	Review of letter to putative class members.	Class Certification	300	150
J. Trunnell	2/10/19	2.5	2.5	Deposition Preparation/narration for Dauzat.	Deposition - Preparation	300	750
J. Trunnell	2/11/19	0.5	0.5	Call to Craig Haney re case updates and Deposition Preparation.	Working with Experts	300	150
J. Trunnell	2/11/19	4.5	4.5	Deposition Preparation/narration for Dauzat.	Deposition - Preparation	300	1350
J. Trunnell	2/12/19	5.5	5.5	Review and edits to opposition to motion to compel.	Motion to Compel	300	1650
J. Trunnell	2/12/19	3.5	3.5	Dauzat Deposition Preparation.	Deposition - Preparation	300	1050
J. Trunnell	2/13/19	0.5	0.5	Call from Tellis's mother.	Client Communications - Relative	300	150
J. Trunnell	2/14/19	2	2	Weekly intake meeting.	Case Management - Team Meeting	300	600
J. Trunnell	2/14/19	0.5	0.5	Call to opposing counsel to meet and confer in good faith.	Meet and Confer	300	150
J. Trunnell	2/15/19	3	3	Review of filings, initial response to appeal.	Appeal - Magistrate	300	900
J. Trunnell	2/15/19	2.5	2.5	Opposition to motion to compel drafting.	Motion to Compel	300	750
J. Trunnell	2/16/19	1.5	1.5	Redrafting letter based on comments and Defendants' new motions.	Motion to Compel	300	450
J. Trunnell	2/20/19	5.5	5.5	Deposition. Arrive at DWCC at 8:30am, departed 3pm.	Deposition	300	1650
J. Trunnell	2/20/19	1	1	One hour lunch, spent in conference.	Status Conference	300	300
J. Trunnell	2/21/19	2.5	2.5	Delay to deposition 8:30-11. Spent reviewing materials and planning for potential shortening, meeting with co-counsel	Deposition	300	750
J. Trunnell	2/21/19	5.5	5.5	11-4:30 deposition	Deposition	300	1650
J. Trunnell	2/22/19	6	6	Client meetings, 8:30-230	Client Meetings	300	1800
J. Trunnell	2/22/19	6.5	6.5	Drive home, 230-9	Travel	300	1950
J. Trunnell	2/24/19	2.5	2.5	Drafting opposition to Defendants' appeal.	Appeal - Magistrate	300	750
J. Trunnell	2/26/19	1.5	1.5	Redactions for depo exhibits.	Deposition	300	450
J. Trunnell	2/26/19	3.5	3.5	Opposition to appeal.	Appeal - Magistrate	300	1050
J. Trunnell	2/28/19	5.5	5.5	Drafting complaint paras and review of DH documents.	Complaint - Second Amended	300	1650
J. Trunnell	2/28/19	2.5	2.5	Review of supplemental reply, making edits in response to ACLU and RKL's comments.	Work with ACLU	300	750
J. Trunnell	3/4/19	3.5	3.5	Review of transcript of Dauzat deposition.	Deposition - Transcripts	300	1050
J. Trunnell	3/5/19	4.5	4.5	Review of final transcript of Dauzat's deposition and integrating it into supplemental filing. Brief call to Ron and response to edits.	Deposition - Transcripts	300	1350
J. Trunnell	3/8/19	3.5	3.5	Preparing RFP and interrogatories, final edits to RFAs, sending to opposing counsel.	Discovery	300	1050
J. Trunnell	3/12/19	5.5	5.5	Drive up to Ruston.	DWCC Visits - Travel	300	1650
J. Trunnell	3/12/19	2.5	2.5	Preparing printouts and trip logistics.	Case Management - Administrative Tasks	300	750
J. Trunnell	3/13/19	8.5	8.5	Travel home, intense rainstorm.	Travel	300	2550
J. Trunnell	3/13/19	7	7	Interviews at DWCC	DWCC Visits	300	2100
J. Trunnell	3/14/19	0.5	0.5	Discussion of attorney client relationship list with Melanie.	Call/Discussion - Co-Counsel	300	150
J. Trunnell	3/18/19	4.5	4.5	Complaint editing and consolidation.	Complaint	300	1350
J. Trunnell	3/19/19	0.5	0.5	Review of MtQ.	Case Management	300	150
J. Trunnell	3/19/19	0.5	0.5	Correspondence with opposing counsel re deposition schedule, discovery, and disclosures.	Deposition - Preparation	300	150
J. Trunnell	3/19/19	2.5	2.5	Edits to discovery objections.	Discovery	300	750
J. Trunnell	3/20/19	6.5	6.5	Editing, researching, and circulating motion for leave to amend.	Motion for Leave to Amend	300	1950
J. Trunnell	3/21/19	2.5	2.5	Drafted and circulated supplement to class memo.	Class Certification	300	750
J. Trunnell	3/21/19	3.5	3.5	Edits to class component of 2nd amended complaint.	Complaint - Second Amended	300	1050
J. Trunnell	3/22/19	1.5	1.5	Review and sending of initial disclosures.	Initial Disclosures	300	450
J. Trunnell	3/22/19	7.5	7.5	Final edits to all motions and components to: Dismiss Tellis Amend Complaint, Supplement Class Memo Filing in ECF.	Class Certification	300	2250
J. Trunnell	3/26/19	2.5	2.5	Printing deposition materials and final checklist before departure to DWCC.	Deposition - Preparation	300	750
J. Trunnell	3/26/19	6.5	6.5	Travel time.	Travel	300	1950
J. Trunnell	3/27/19	2.5	2.5	Preparation of Bruce Charles.	Deposition - Preparation	300	750
J. Trunnell	3/27/19	1	1	Debrief post pill call depo	Deposition - Debrief	300	300
J. Trunnell	3/27/19	2	2	Deposition of pill call.	Deposition	300	600
J. Trunnell	3/27/19	2	2	Drafting opposition to protective order.	Motion for Protective Order	300	600
J. Trunnell	3/28/19	1	1	Travel to DWCC.	DWCC Visits - Travel	300	300
J. Trunnell	3/28/19	3.5	3.5	Deposition of Bruce Charles.	Deposition	300	1050
J. Trunnell	3/29/19	6	6	Deposition of Hayden.	Deposition	300	1800
J. Trunnell	3/29/19	6.5	6.5	Driving home.	Travel	300	1950
J. Trunnell	3/29/19	1	1	Waiting for late court reporter.	Deposition	300	300
J. Trunnell	3/29/19	1	1	Travel to DWCC.	DWCC Visits - Travel	300	300
J. Trunnell	3/31/19	2	2	Opposition to D's 2nd motion for PO.	Motion for Protective Order	300	600
J. Trunnell	4/5/19	1.5	1.5	Preliminary schedule planning.	Case Management - Planning	300	450
J. Trunnell	4/8/19	1	1	Draft of motion on scheduling.	Motion on Scheduling	300	300
J. Trunnell	4/9/19	1.5	1.5	Drafting motion on scheduling.	Motion on Scheduling	300	450
J. Trunnell	4/15/19	2.5	2.5	Research on standing on leave to amend complaint, drafting reply to Defendants' opposition.	Complaint - Amended	300	750
J. Trunnell	4/16/19	1.5	1.5	Research and drafting reply to opposition to leave to amend.	Motion for Leave to Amend	300	450
J. Trunnell	4/18/19	1.5	1.5	Case fact/proof chart updates.	Trial Preparation	300	450
J. Trunnell	4/18/19	0.5	0.5	Circulating internal scheduling memo.	Case Management - Planning	300	150
J. Trunnell	4/18/19	3	3	Case strategy and scheduling meeting.	Case Management - Planning	300	900
J. Trunnell	4/19/19	0.5	0.5	Briefing intern on spoliation writing assignment.	Motion for Spoliation	300	150
J. Trunnell	4/22/19	4.5	4.5	Spoliation memo research.	Motion for Spoliation	300	1350
J. Trunnell	4/23/19	2	2	Reviewing Georgia expert report.	Working with Experts	300	600
J. Trunnell	4/24/19	5.5	5.5	Research and drafting on spoliation memo.	Motion for Spoliation	300	1650
J. Trunnell	4/25/19	1	1	Weekly intake meeting and letter review.	Case Management - Team Meeting	300	300
J. Trunnell	4/25/19	3	3	Drafting and filing sur-reply memorandum.	Sur-Reply	300	900
J. Trunnell	4/26/19	0.5	0.5	Niles McDonald second to last day wrap-up meeting.	Case Management	300	150
J. Trunnell	4/26/19	2	2	Folding, stuffing, mailing mass update.	Mass Mailing	300	600
J. Trunnell	4/30/19	1	1	Debrief following call.	Preparation - Status Conference	300	300
J. Trunnell	4/30/19	0.5	0.5	Call with Magistrate Hornsby.	Appeal - Magistrate	300	150
J. Trunnell	5/3/19	0.5	0.5	Meeting with Angela to explain current status of case, summary judgment, etc.	Case Management	300	150
J. Trunnell	5/6/19	6.5	6.5	Drive up to DWCC.	DWCC Visits - Travel	300	1950
J. Trunnell	5/8/19	5.5	5.5	Interviews 8:30-2	DWCC Visits	300	1650
J. Trunnell	5/8/19	7	7	Travel back to New Orleans. Unforeseen I-10 closure forced reroute through north shore.	DWCC Visits - Travel	300	2100
J. Trunnell	5/13/19	3.5	3.5	Chart of expert needs and discovery requests, based on GA report.	Discovery	300	1050
J. Trunnell	5/16/19	0.5	0.5	Call to baby mother of Luis Geuvara.	Client Communications - Relative	300	150
J. Trunnell	5/16/19	2	2	Drafting letters	Intake Letters	300	600
J. Trunnell	5/17/19	0.5	0.5	Sent e-mail to opposing counsel.	Correspondence - Opposing Counsel	300	150
J. Trunnell	5/20/19	0.5	0.5	Filing withdrawal of DH.	Case Management	300	150
J. Trunnell	5/20/19	1.5	1.5	Review of Vera report.	Case Management	300	450
J. Trunnell	5/22/19	3.5	3.5	Preparation on spoliation motion.	Motion for Spoliation	300	1050
J. Trunnell	5/23/19	4.5	4.5	Beginning preparation for settlement conference. Review of other settlement agreements.	Settlement Conference - Preparation	300	1350
J. Trunnell	5/24/19	2.5	2.5	Review of settlement agreements.	Settlement Agreement	300	750
J. Trunnell	5/24/19	1.5	1.5	Review of discovery set 2.	Discovery	300	450

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	5/26/19	4.5	4.5	Drafting spoliation motion.	Motion for Spoliation	300	1350
J. Trunnell	5/28/19	2.5	2.5	Continued preparations for settlement conference.	Settlement Agreement	300	750
J. Trunnell	5/29/19	3.5	3.5	Spoliation memo	Motion for Spoliation	300	1050
J. Trunnell	5/29/19	2.5	2.5	Review of settlement agreements.	Settlement Agreement	300	750
J. Trunnell	5/30/19	5	5	Discovery work allocation meeting and filemaker training.	Case Management - Planning	300	1500
J. Trunnell	5/31/19	2.5	2.5	Review of filings regarding access for law students.	Case Management - Staffing	300	750
J. Trunnell	5/31/19	1.5	1.5	Conversation with Ron, follow up review of settlement agreement regarding MDLA access suit violation.	Settlement Agreement	300	450
J. Trunnell	6/10/19	4.5	4.5	Discovery review and work assignments.	Discovery	300	1350
J. Trunnell	6/11/19	3.5	3.5	Assignment spreadsheet and discovery review.	Discovery	300	1050
J. Trunnell	6/12/19	2.5	2.5	RFP 1 spreadsheet.	Request for Production	300	750
J. Trunnell	6/12/19	2	2	Expert visit notice, finalized notice of contact with represented client, drafting discovery request for expert notes on confirmation of visit.	Discovery	300	600
J. Trunnell	6/13/19	2.5	2.5	Review of AC discovery responses.	Discovery	300	750
J. Trunnell	6/14/19	2.5	2.5	Correspondence review and approval. Drafted letter to Ronald Brooks.	Client Letters	300	750
J. Trunnell	5/10/17	1	1	Meetings with Derrick & meeting with Chelsea, continuing transition on to case	Case Management - Staffing	300	300
J. Trunnell	5/12/17	3.5	3.5	Meetings with Derrick on visits, research on Eighth Amendment claims.	Legal Research	300	1050
J. Trunnell	5/17/17	2	2	Call to Hunt to schedule meeting and verify receipt of forms, research, correspondence with the rest of the team.	EHCC Visits	300	600
J. Trunnell	5/19/17	2.5	2.5	Meeting with team, correspondence with clients and MacArthur	Case Management - Team Meeting	300	750
J. Trunnell	6/9/17	3.5	3.5	Meeting with Ron, Chelsea and Derek with MacArthur Justice. Laying out timeline for DWCC visits and a highly aggressive letter to Griffin.	DWCC Visits - Preparation	300	1050
J. Trunnell	6/13/17	3.5	3.5	Correspondence w/ Griffin, work on motion to enforce	Motion to Enforce Settlement Agreement	300	1050
J. Trunnell	6/21/17	16	16	Day 1 of visit. Departed hotel 7am, returned 8pm. 9-12am, document review and interview prep	DWCC Visits	300	4800
J. Trunnell	6/22/17	14	14	Day 2 of visit. 6:30am - 8pm, prison visit (w/ lunch and dinner meetings). 8:30-9 emails and checking that all records were packed up.	DWCC Visits	300	4200
J. Trunnell	6/23/17	7	7	Travel home, started 9am, arrived 4pm.	DWCC Visits - Travel	300	2100
J. Trunnell	6/23/17	0.5	0.5	Started drafting memos.	DWCC Visit Memos	300	150
J. Trunnell	6/26/17	5.5	5.5	Finalizing memoranda, discussing next steps, preparation and research for next steps meeting @ MacArthur	DWCC Visit Memos	300	1650
J. Trunnell	7/5/17	2.5	2.5	Review and edits on draft complaint	Complaint	300	750
J. Trunnell	7/6/17	3	3	Further edits to complaint. Revised draft circulated to group	Complaint	300	900
J. Trunnell	7/18/17	7.5	7.5	Citations added. Memo and complaint draft circulated, only a few loose ends.	Complaint	300	2250
J. Trunnell	7/19/17	5	5	Last rounds of editing. Complaint sent to KS for her final blessing.	Complaint	300	1500
J. Trunnell	7/20/17	5.5	5.5	Complaint and TRO filed. Call to court	Complaint	300	1650
J. Trunnell	7/27/17	4	4	Finalizing meeting notes, redlining settlement agreement from LSP Access case.	Settlement Agreement	300	1200
J. Trunnell	8/2/17	1	1	Staffing meeting on case work distribution	Case Management - Staffing	300	300
J. Trunnell	8/2/17	1.5	1.5	Research and prep	Legal Research	300	450
J. Trunnell	8/2/17	1.5	1.5	Meeting with Derek Warden on transition off case.	Case Management - Staffing	300	450
J. Trunnell	8/4/17	6	6	Finalizing and submitting motion	Vague	300	1800
J. Trunnell	8/9/17	3.5	3.5	Motion to strike pleading per clerk's request (.8) Meeting with Chelsea and call to Katie regarding next steps.	Case Management - Team Meeting	300	1050
J. Trunnell	8/17/17	2	2	orientation meeting for new attorneys and Derenda	Case Management - Staffing	300	600
J. Trunnell	8/27/17	6	6	Travel up to Minden.	DWCC Visits - Travel	300	1800
J. Trunnell	8/28/17	6	6	Tier visit, inmate interviews	DWCC Visits	300	1800
J. Trunnell	8/28/17	3	3	Travel and debrief	DWCC Visits - Travel	300	900
J. Trunnell	8/28/17	1.5	1.5	Prep for next day individually	DWCC Visits - Preparation	300	450
J. Trunnell	8/29/17	7	7	Inmate interviews (7)	DWCC Visits	300	2100
J. Trunnell	8/29/17	6	6	travel back to New Orleans and debrief (6)	DWCC Visits - Travel	300	1800
J. Trunnell	8/31/17	7	7	Inmate memos and circulated contempt letter	Contempt Letter	300	2100
J. Trunnell	9/1/17	6.5	6.5	Inmate memos and sent contempt letter	Contempt Letter	300	1950
J. Trunnell	9/4/17	5.5	5.5	Finished inmate interview memos	DWCC Visit Memos	300	1650
J. Trunnell	9/12/17	0.5	0.5	Debriefing with team on their return from DWCC. (0.5)	Case Management - Team Meeting	300	150
J. Trunnell	9/17/17	6.5	6.5	Complaint drafting.	Complaint	300	1950
J. Trunnell	9/18/17	8.5	8.5	Complaint drafting. Research on obscenity, sex offenses, and retaliation.	Complaint	300	2550
J. Trunnell	9/19/17	2.5	2.5	Case meeting: 2.5	Case Management - Team Meeting	300	750
J. Trunnell	9/26/17	2.5	2.5	Correspondence and intake meeting - 2.5	Case Management - Team Meeting	300	750
J. Trunnell	9/26/17	1.5	1.5	Research in preparation for trip up to DWCC 1.5	DWCC Visits - Preparation	300	450
J. Trunnell	9/27/17	4.5	4.5	Finalizing research, preparing interview questions and document packets.	DWCC Visits - Preparation	300	1350
J. Trunnell	9/28/17	7.5	7.5	Travel to DWCC locality, review of correspondence.	DWCC Visits - Travel	300	2250
J. Trunnell	9/29/17	12	12	Travel to DWCC, interviews, return travel	DWCC Visits - Travel	300	3600
J. Trunnell	10/2/17	4.5	4.5	Case planning documents - 4.5	Case Management - Planning	300	1350
J. Trunnell	10/3/17	2	2	Correspondence and intake meeting - 2	Case Management - Team Meeting	300	600
J. Trunnell	10/3/17	1.5	1.5	Expert research - 1.5	Working with Experts	300	450
J. Trunnell	10/3/17	0.5	0.5	Case planning document drafting - 0.5	Case Management - Planning	300	150
J. Trunnell	10/4/17	3	3	Expert Research	Working with Experts	300	900
J. Trunnell	10/9/17	1.5	1.5	Preparation for weekly meeting: legal team check-in and review of notes	Case Management	300	450
J. Trunnell	10/12/17	3	3	Drafting and research on spoliation letter (3)	Evidence Spoliation	300	900
J. Trunnell	10/15/17	2	2	Review of M.Bray's interview prep documents, suggested revisions for questions.	DWCC Visits - Preparation	300	600
J. Trunnell	10/16/17	1	1	Drafting letter on evidence destruction (1)	Evidence Spoliation	300	300
J. Trunnell	10/18/17	0.5	0.5	Coordinating visit to EHCC (0.5)	EHCC Visits	300	150
J. Trunnell	10/18/17	4.5	4.5	Drafting, finalizing, and sending letter on spoliation. (4.5)	Evidence Spoliation	300	1350
J. Trunnell	10/20/17	3.5	3.5	Visits (9:30-11, 1-3)	EHCC Visits	300	1050
J. Trunnell	10/20/17	2	2	Meeting on interviews and prep for next round (11-1)	DWCC Visits - Preparation	300	600
J. Trunnell	10/23/17	2.5	2.5	Drafting Plaintiff portion of complaint	Complaint	300	750
J. Trunnell	10/25/17	2	2	DWCC correspondence and status meeting 10-12	Case Management - Team Meeting	300	600
J. Trunnell	10/26/17	1.5	1.5	meeting (2:15-3:45)	Vague	300	450
J. Trunnell	10/26/17	2	2	return travel (3:45-5:45)	Travel	300	600
J. Trunnell	10/30/17	1.5	1.5	Carlton Turner visitation issue, outline and discussion w/ SV (1.5)	Call/Discussion - Co-Counsel	300	450
J. Trunnell	10/31/17	2	2	Reexamination of plaintiff section following inmate transfers.	Complaint	300	600
J. Trunnell	11/1/17	2	2	Weekly letter intake and strategy session (2)	Case Management - Team Meeting	300	600
J. Trunnell	11/1/17	4	4	Drafting new plaintiff section (4)	Complaint	300	1200
J. Trunnell	11/2/17	4	4	Research on FRCP 23 (4)	Legal Research	300	1200
J. Trunnell	11/6/17	1	1	Meeting with Melanie to divide work on class and sub class (1)	Case Management - Staffing	300	300
J. Trunnell	11/6/17	3.5	3.5	Drafting motion (3.5)	Motion for Class Certification	300	1050
J. Trunnell	11/8/17	2	2	Meeting to discuss TRO (2)	TRO	300	600
J. Trunnell	11/8/17	6	6	Drafting TRO (6)	TRO	300	1800
J. Trunnell	11/9/17	6	6	Drafting TRO and reviewing complaint (6)	TRO	300	1800

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	11/9/17	1	1	Correspondence with DoC (1)	Correspondence - DOC	300	300
J. Trunnell	11/9/17	3.5	3.5	Research on spoliation law (3.5)	Evidence Spoliation	300	1050
J. Trunnell	11/12/17	6.5	6.5	Drafting and researching memo in support of TRO (6.5)	TRO	300	1950
J. Trunnell	11/12/17	1.5	1.5	Preparation for visit to DWCC (1.5)	DWCC Visits - Preparation	300	450
J. Trunnell	11/14/17	6.5	6.5	Travel to DWCC 6.5	DWCC Visits - Travel	300	1950
J. Trunnell	11/14/17	1	1	Visit at DWCC 1	DWCC Visits	300	300
J. Trunnell	11/15/17	6	6	Visit to DWCC and transporting equipment, 6	DWCC Visits	300	1800
J. Trunnell	11/15/17	4.5	4.5	Revisions to Memorandum in support of TRO 4.5	TRO	300	1350
J. Trunnell	11/16/17	6.5	6.5	Travel back to AC Office, 6.5	DWCC Visits - Travel	300	1950
J. Trunnell	11/16/17	1	1	Edits to TRO memo 1	TRO	300	300
J. Trunnell	11/17/17	5	5	Revisions to complaint. 5	Complaint	300	1500
J. Trunnell	11/17/17	2	2	Draft of TRO order 2	TRO	300	600
J. Trunnell	11/18/17	7.5	7.5	Reorganization and edits to complaint. Draft circulated to group. 7.5	Complaint	300	2250
J. Trunnell	11/19/17	6	6	Reorganization and edits to TRO Memo. Draft circulated to group. 6	TRO	300	1800
J. Trunnell	11/20/17	5.5	5.5	Revisions to Complaint, Motion, TRO, proposed order, and memo. Organized and uploaded all drafts for final approval. 5.5	Complaint	300	1650
J. Trunnell	6/17/19	1.5	1.5	Draft letter re Eldon Vail to MacArthur	Working with Experts	300	450
J. Trunnell	6/19/19	3.5	3.5	Spoliation memo drafting and research.	Motion for Spoliation	300	1050
J. Trunnell	6/20/19	2	2	Review of magistrate's orders, charting implications re expert report	Working with Experts	300	600
J. Trunnell	6/20/19	1	1	Review of HALT solitary act from NY for ideas on MH treatment and end goals	Legal Research	300	300
J. Trunnell	6/20/19	1.5	1.5	Spoliation memo	Motion for Spoliation	300	450
J. Trunnell	6/24/19	6.5	6.5	Finalizing and batching our discovery production. Computer failures on upload complicated it substantially.	Discovery	300	1950
J. Trunnell	6/25/19	2.5	2.5	Observing press conference re solitary confinement	Case Matters	300	750
J. Trunnell	6/25/19	3	3	Review of ACLU/JSRI report	Work with ACLU	300	900
J. Trunnell	6/26/19	4.5	4.5	Review of magistrate's orders, work plan for discovery production	Discovery	300	1350
J. Trunnell	6/27/19	0.5	0.5	Review of ACLU research re media comments	Work with ACLU	300	150
J. Trunnell	6/27/19	0.5	0.5	Coordinating logistics for visit with William Van Der Pol re his own experience with settlement negotiations in similar Alabama case.	Working with Experts	300	150
J. Trunnell	6/27/19	2.5	2.5	Spoliation memo prep	Motion for Spoliation	300	750
J. Trunnell	6/27/19	1	1	Initial review of spoliation memo and meeting with J. Grant.	Motion for Spoliation	300	300
J. Trunnell	7/1/19	1	1	Review of final draft of memo on settlement agreements.	Settlement Agreement	300	300
J. Trunnell	7/2/19	2.5	2.5	Expert retention logistics	Working with Experts	300	750
J. Trunnell	7/2/19	2	2	Review of correspondence, edits to memos	Case Management	300	600
J. Trunnell	7/8/19	2.5	2.5	It is after 7pm, so drafted motions for contempt on order to compel	Motion for Contempt	300	750
J. Trunnell	7/11/19	7.5	7.5	Meeting with ADAP on case strategy and lessons learned from Braggs v. Dunn	Case Matters	300	2250
J. Trunnell	7/16/19	4.5	4.5	Continued review of ARPs and prep for OTC response.	OTC Response	300	1350
J. Trunnell	7/17/19	3.5	3.5	Review of ARPs and prep for OTC response.	OTC Response	300	1050
J. Trunnell	7/18/19	0.5	0.5	Finalizing and sending updated expert visit notice	Working with Experts	300	150
J. Trunnell	7/24/19	6	6	Trip to DWCC	DWCC Visits - Travel	300	1800
J. Trunnell	7/25/19	8	8	Interviews at DWCC (8:30-4:30)	DWCC Visits	300	2400
J. Trunnell	7/26/19	5.5	5.5	Interviews at DWCC (8:30-2)	DWCC Visits	300	1650
J. Trunnell	7/26/19	6	6	Travel home	Travel	300	1800
J. Trunnell	7/29/19	1	1	Letter re Bruce Charles and potential retaliation.	Case Management	300	300
J. Trunnell	7/31/19	1.5	1.5	Case to-do checklist review, agenda for meeting.	Case Management - Planning	300	450
J. Trunnell	8/1/19	1.5	1.5	Weekly meeting	Case Management - Team Meeting	300	450
J. Trunnell	8/1/19	0.5	0.5	Email to opposing counsel re discovery	Discovery	300	150
J. Trunnell	8/2/19	2	2	Comparison figures for Loyola grads, discussion w/ Ron, meeting with Mel on logistics.	Case Management - Staffing	300	600
J. Trunnell	8/2/19	0.5	0.5	Followup with GWV and MB re call from Brandon Jackson's mother	Case Management	300	150
J. Trunnell	8/6/19	0.5	0.5	Call to coroner, email and certified letter of PRA Request.	Public Record Requests	300	150
J. Trunnell	8/7/19	1.5	1.5	Review of discovery non-responses, initial research on reply.	Discovery	300	450
J. Trunnell	8/8/19	3.5	3.5	Review of resumes, interviews, and final decisionmaking re candidates for DWCC fellows.	Case Management - Staffing	300	1050
J. Trunnell	8/8/19	0.5	0.5	Call to coroner re PRA request	Public Record Requests	300	150
J. Trunnell	8/9/19	1.5	1.5	Final logistics for graduate clerks starting Monday	Case Management - Staffing	300	450
J. Trunnell	8/13/19	1.5	1.5	Drafting discovery set 9, review of publicly available DoC info on MH beds.	Discovery	300	450
J. Trunnell	8/15/19	1.5	1.5	Weekly meeting	Case Management - Team Meeting	300	450
J. Trunnell	8/15/19	0.5	0.5	Finalizing and distributing draft of set 9	Discovery	300	150
J. Trunnell	8/19/19	0.5	0.5	Prep for interviews with post-bar fellows.	Case Management - Staffing	300	150
J. Trunnell	8/20/19	2	2	Interviews for post-bar fellows. Decision-making.	Case Management - Staffing	300	600
J. Trunnell	8/20/19	3.5	3.5	Review of armory records	Case Management	300	1050
J. Trunnell	8/22/19	1.5	1.5	Weekly meeting, including how to replace Angela and Eldon.	Case Management - Team Meeting	300	450
J. Trunnell	8/26/19	1.5	1.5	Internal prep for mediation	Mediation - Preparation	300	450
J. Trunnell	8/26/19	0.5	0.5	Call to Mikey re report on spoliation	Motion for Spoliation	300	150
J. Trunnell	8/28/19	0.5	0.5	Review of offer and estimate from Matt and Mikey	Case Management	300	150
J. Trunnell	8/28/19	1	1	Review of response to subpoena by LFC	Case Management	300	300
J. Trunnell	9/2/19	3.5	3.5	Draft of mediation statement to court.	Mediation	300	1050
J. Trunnell	9/3/19	4.5	4.5	Finalizing section on reporting and records for proposed consent decree.	Proposed Consent Decree	300	1350
J. Trunnell	9/5/19	6	6	Travel to Monroe	Mediation - Travel	300	1800
J. Trunnell	9/5/19	2.5	2.5	Final prep for departure and printing client briefing materials.	Mediation - Preparation	300	750
J. Trunnell	9/5/19	0.5	0.5	Abbreviated weekly meeting	Case Management - Team Meeting	300	150
J. Trunnell	9/5/19	0.5	0.5	Call to Mercedes re KSWB negotiation tactics.	Case Management	300	150
J. Trunnell	9/6/19	0.5	0.5	Correspondence to Pacholke w/ offer	Working with Experts	300	150
J. Trunnell	9/7/19	4.5	4.5	Case meeting, prep for negotiation, and fact/proof chart review.	Case Management	300	1350
J. Trunnell	9/7/19	0.5	0.5	Meeting re settlement strategy and Defendants' letter.	Settlement Agreement	300	150
J. Trunnell	9/9/19	6	6	Travel back to New Orleans	Travel	300	1800
J. Trunnell	9/12/19	4.5	4.5	Research and drafting on Rule 35 motion. Defendants' wild argument, hunt for analogy.	Motion for Mental Exams	300	1350
J. Trunnell	9/13/19	1.5	1.5	Review of cases re post-discovery facts	Discovery	300	450
J. Trunnell	9/13/19	1	1	Weekly meeting re case developments.	Case Management - Team Meeting	300	300
J. Trunnell	9/16/19	2.5	2.5	Review of discovery gaps and pre-call huddle.	Discovery	300	750
J. Trunnell	9/17/19	2.5	2.5	Deposition list for merits.	Deposition	300	750
J. Trunnell	9/24/19	2.5	2.5	Drafting motion in limine	Motion in Limine	300	750
J. Trunnell	9/25/19	0.5	0.5	Correspondence with opposing counsel, coordinating logistics	Correspondence - Opposing Counsel	300	150
J. Trunnell	9/26/19	2.5	2.5	Review of motion for contempt	Motion for Contempt	300	750
J. Trunnell	9/26/19	1.5	1.5	Weekly case status meeting.	Case Management - Team Meeting	300	450
J. Trunnell	9/26/19	0.5	0.5	Meet and confer.	Meet and Confer	300	150
J. Trunnell	9/27/19	0.5	0.5	Summarizing use of force standards into memo.	Case Management	300	150
J. Trunnell	9/27/19	0.5	0.5	Call to Katie regarding discovery.	Discovery	300	150
J. Trunnell	9/30/19	0.5	0.5	Coordinating with expert witnesses	Working with Experts	300	150
J. Trunnell	10/1/19	0.5	0.5	Review of magistrate's order	Appeal - Magistrate	300	150
J. Trunnell	10/4/19	0.5	0.5	Correspondence with opposing counsel on depositions.	Deposition - Preparation	300	150

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	10/7/19	0.5	0.5	Verifying completeness of correspondence documents to Dan Pacholke. Preparing to send.	Working with Experts	300	150
J. Trunnell	10/9/19	0.5	0.5	Logistics regarding grad fellow time extension.	Case Management	300	150
J. Trunnell	10/9/19	1	1	Pharmacy record analysis, attempt to create way to track expense of non-delivered medication.	Case Management	300	300
J. Trunnell	10/10/19	1	1	Weekly intake meeting.	Case Management - Team Meeting	300	300
J. Trunnell	10/10/19	1.5	1.5	Attempt to wrestle with vinelink. No ability to find any people online.	Researching Prisoner Location	300	450
J. Trunnell	10/11/19	1.5	1.5	Review of filings by other P&A groups on 30b6 depositions.	30(b)(6) Deposition	300	450
J. Trunnell	10/11/19	0.5	0.5	Meeting with Melanie regarding inability to upload documents.	Case Management - Technology Issues	300	150
J. Trunnell	10/14/19	1	1	Reviewing list and preparing for visit to EHCC	EHCC Visits	300	300
J. Trunnell	10/14/19	1.5	1.5	Logistics and preparation for expert site visit.	EHCC Visits	300	450
J. Trunnell	10/15/19	1	1	Logistical discussion and strategy regarding deposition notice.	Deposition - Preparation	300	300
J. Trunnell	10/18/19	4	4	9:40-11 and 12:50-330, client visits to EHCC	EHCC Visits	300	1200
J. Trunnell	10/22/19	6	6	Travel to Ruston	DWCC Visits - Travel	300	1800
J. Trunnell	10/22/19	1	1	Pre-inspection planning meeting with experts.	Working with Experts	300	300
J. Trunnell	10/23/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	10/23/19	10	10	Site inspection	DWCC Visits	300	3000
J. Trunnell	10/23/19	1	1	Debrief with experts	Working with Experts	300	300
J. Trunnell	10/23/19	1	1	Travel from DWCC to Ruston	DWCC Visits - Travel	300	300
J. Trunnell	10/24/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	10/24/19	8	8	Client interviews at DWCC: expert logistics, intermittent prep on reply briefs.	DWCC Visits	300	2400
J. Trunnell	10/24/19	1	1	Travel from DWCC to Ruston	DWCC Visits - Travel	300	300
J. Trunnell	10/25/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	10/25/19	6.5	6.5	Travel from DWCC to NO	DWCC Visits - Travel	300	1950
J. Trunnell	10/28/19	1	1	Motion for contempt re discovery	Motion for Contempt	300	300
J. Trunnell	10/29/19	4.5	4.5	Responding to ACLU commentary, redrafting and research reply to MiL, Motion to Strike Jury Demand	Motion to Strike Jury Demand	300	1350
J. Trunnell	10/31/19	1	1	Weekly intake meeting	Case Management - Team Meeting	300	300
J. Trunnell	10/31/19	0.5	0.5	Meeting with Leah re weekly correspondence.	Case Management	300	150
J. Trunnell	11/3/19	1.5	1.5	Review of motion for sanctions	Motion for Sanctions	300	450
J. Trunnell	11/6/19	1	1	Review of deposition assignments and compiling meeting agenda	Deposition - Preparation	300	300
J. Trunnell	11/11/19	1.5	1.5	Redacting motion for contempt re discovery.	Motion for Contempt	300	450
J. Trunnell	11/12/19	6.5	6.5	Deposition Preparation for Chris Rodriguez	Deposition - Preparation	300	1950
J. Trunnell	11/12/19	1	1	Finalizing and filing motion for additional interrogatories.	Motion for Additional Interrogatories	300	300
J. Trunnell	11/13/19	1	1	Deposition logistics, email to opposing counsel.	Deposition - Preparation	300	300
J. Trunnell	11/14/19	1	1	Teleconference with the Court.	Case Management	300	300
J. Trunnell	11/14/19	0.5	0.5	Prep for teleconference with the Court	Case Management	300	150
J. Trunnell	11/14/19	1.5	1.5	Post meeting drafting memo on list.	Case Management	300	450
J. Trunnell	11/19/19	1.5	1.5	Logistics on deposition notices.	Deposition - Preparation	300	450
J. Trunnell	11/19/19	1	1	Review of opposing counsel opposition.	Appeal - Magistrate	300	300
J. Trunnell	11/19/19	4.5	4.5	Pill call Deposition - Preparation	Deposition - Preparation	300	1350
J. Trunnell	11/20/19	3.5	3.5	Deposition strategy meeting.	Deposition - Preparation	300	1050
J. Trunnell	11/20/19	1.5	1.5	Huff Deposition Preparation	Deposition - Preparation	300	450
J. Trunnell	11/21/19	2	2	Debrief meeting and review of correspondence with opposing counsel	Case Management - Team Meeting	300	600
J. Trunnell	11/22/19	0.5	0.5	Memo on call to Craig	Case Management	300	150
J. Trunnell	11/22/19	2.5	2.5	Pill call depo prep	Deposition - Preparation	300	750
J. Trunnell	11/23/19	1	1	Revisions to set 10	Discovery	300	300
J. Trunnell	11/23/19	2.5	2.5	Document review and correspondence with ACLU re Deposition Preparation	Deposition - Preparation	300	750
J. Trunnell	11/24/19	2	2	Deposition Preparation for Huff	Deposition - Preparation	300	600
J. Trunnell	11/27/19	0.5	0.5	Prep for meet and confer.	Meet and Confer	300	150
J. Trunnell	12/1/19	7	7	Travel to DWCC	DWCC Visits - Travel	300	2100
J. Trunnell	12/2/19	9	9	Client meetings at DWCC.	DWCC Visits	300	2700
J. Trunnell	12/3/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/3/19	6.5	6.5	Client meetings at DWCC.	DWCC Visits	300	1950
J. Trunnell	12/3/19	0.5	0.5	Review of Defendants' filings and new orders.	Case Matters	300	150
J. Trunnell	12/4/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/4/19	6	6	Depositions of Alvin Ball, John Booth, Dameion Brumfield, Matt Carroll, Cody Doucet.	Deposition	300	1800
J. Trunnell	12/4/19	0.5	0.5	Logistics on possibility of rescheduling depositions.	Deposition - Preparation	300	150
J. Trunnell	12/4/19	2.5	2.5	Deposition defense preparation.	Deposition - Preparation	300	750
J. Trunnell	12/4/19	0.5	0.5	Review of Court orders	Review - Court Order	300	150
J. Trunnell	12/5/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/5/19	1	1	Travel from DWCC back to Ruston	DWCC Visits - Travel	300	300
J. Trunnell	12/6/19	1	1	Travel back to Ruston	DWCC Visits - Travel	300	300
J. Trunnell	12/7/19	3.5	3.5	Huff Deposition Preparation	Deposition - Preparation	300	1050
J. Trunnell	12/9/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/9/19	1	1	Travel from DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/9/19	2.5	2.5	Finalizing and printing last documents for Huff depo.	Deposition - Preparation	300	750
J. Trunnell	12/10/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/11/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/11/19	7	7	Deposition of Sherman	Deposition	300	2100
J. Trunnell	12/11/19	1	1	Travel from DWCC to Ruston	DWCC Visits - Travel	300	300
J. Trunnell	12/11/19	2.5	2.5	Final prep for pill call depositions.	Deposition - Preparation	300	750
J. Trunnell	12/12/19	1	1	Travel to DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/12/19	7.5	7.5	Depositions of Pitts and Scriber	Deposition	300	2250
J. Trunnell	12/12/19	1	1	Travel from DWCC	DWCC Visits - Travel	300	300
J. Trunnell	12/13/19	2.5	2.5	Review of reply re motion for sancitons, filing.	Motion for Sanctions	300	750
J. Trunnell	12/13/19	6	6	Travel from Ruston to New Orleans	DWCC Visits - Travel	300	1800
J. Trunnell	12/17/19	1.5	1.5	Additions and edits to Discovery Set 11.	Discovery	300	450
J. Trunnell	12/17/19	2.5	2.5	Deposition scheduling and assignments, first draft.	Deposition - Preparation	300	750
J. Trunnell	12/18/19	2.5	2.5	Depo Defense Preparation and document review, incl. meeting w/ Emma	Deposition - Preparation	300	750
J. Trunnell	12/19/19	1.5	1.5	Deposition logistics.	Deposition - Preparation	300	450
J. Trunnell	12/20/19	2.5	2.5	Deposition Preparation for Dr. Fuller.	Deposition - Preparation	300	750
J. Trunnell	12/24/19	1.5	1.5	Opposition to motion to compel 30(b)(6)	30(b)(6) Deposition	300	450
J. Trunnell	12/26/19	2.5	2.5	Opposition to motion to compel 30(b)(6)	30(b)(6) Deposition	300	750
J. Trunnell	12/26/19	1.5	1.5	Deposition Preparation re Huey.	Deposition - Preparation	300	450
J. Trunnell	12/27/19	6.5	6.5	Review of D's 4th Motion to Compel and drafting response	Motion to Compel	300	1950
J. Trunnell	12/30/19	3.5	3.5	Opposition to D's 4th MiC	Motion to Compel	300	1050
J. Trunnell	12/31/19	0.5	0.5	ECF filings, motion for excess pages	Motion for Excess Pages	300	150
J. Trunnell	1/1/20	6	6	Travel to Ruston	Travel	300	1800
J. Trunnell	1/2/20	8	8	Client prep visits	DWCC Visits	300	2400
J. Trunnell	1/2/20	1	1	Travel from DWCC	DWCC Visits	300	300
J. Trunnell	1/3/20	7.5	7.5	Client visits	DWCC Visits	300	2250
J. Trunnell	1/5/20	2	2	Adkins suicide watch log reviews	Case Management	300	600
J. Trunnell	1/6/20	6	6	Deposition Preparation with clients at DWCC.	Deposition - Preparation	300	1800
J. Trunnell	1/6/20	0.5	0.5	Call to Dan Pacholke	Working with Experts	300	150

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	1/9/20	4.5	4.5	Depositions	Deposition	300	1350
J. Trunnell	1/9/20	1.5	1.5	Review of D's filings.	Case Management	300	450
J. Trunnell	1/10/20	1.5	1.5	Depositions	Deposition	300	450
J. Trunnell	1/10/20	3.5	3.5	Finalizing edits re mootness	Case Management	300	1050
J. Trunnell	1/12/20	3.5	3.5	Fuller question finalizing, folder organizing.	Deposition	300	1050
J. Trunnell	1/12/20	2.5	2.5	Fuller depo prep	Deposition - Preparation	300	750
J. Trunnell	1/12/20	1	1	Assignments and case status updates.	Case Management	300	300
J. Trunnell	1/13/20	2	2	Final exhibit sorting and Fuller depo finalization.	Deposition	300	600
J. Trunnell	1/14/20	2.5	2.5	Fuller deposition	Deposition	300	750
J. Trunnell	1/15/20	2	2	Final Adkins depo prep.	Deposition - Preparation	300	600
J. Trunnell	1/17/20	5.5	5.5	Drive back from Ruston to NO.	DWCC Visits	300	1650
J. Trunnell	1/22/20	1.5	1.5	Finalizing and filing sur-replies.	Sur-Reply	300	450
J. Trunnell	1/22/20	0.5	0.5	Memo follow-up after meet and confer.	Discovery	300	150
J. Trunnell	1/22/20	1.5	1.5	Deposition logistics and swapping around.	Deposition	300	450
J. Trunnell	1/22/20	0.5	0.5	Visit list for EHCC review	EHCC Visits	300	150
J. Trunnell	1/23/20	1	1	Correspondence catch-up	Case Management	300	300
J. Trunnell	1/23/20	1	1	Weekly meeting, Emma and Leah	Case Management - Team Meeting	300	300
J. Trunnell	1/28/20	4.5	4.5	Reply to opposition on standing/class cert.	Class Certification	300	1350
J. Trunnell	1/29/20	2	2	Reply on class certification and standing.	Class Certification	300	600
J. Trunnell	1/30/20	1.5	1.5	Prep for client visits at EHCC	EHCC Visits	300	450
J. Trunnell	1/30/20	3.5	3.5	Trupiano Deposition Preparation	Deposition - Preparation	300	1050
J. Trunnell	1/31/20	1	1	Review of nurse Williams depo.	Deposition	300	300
J. Trunnell	2/1/20	5.5	5.5	Mays and Baird Deposition Preparation	Deposition - Preparation	300	1650
J. Trunnell	2/2/20	5.5	5.5	Travel to Ruston.	Travel	300	1650
J. Trunnell	2/3/20	2	2	Defending depositions.	Deposition	300	600
J. Trunnell	2/3/20	3	3	Deposition of Williams	Deposition	300	900
J. Trunnell	2/3/20	1	1	Travel to DWCC	DWCC Visits	300	300
J. Trunnell	2/3/20	1	1	Travel from DWCC	DWCC Visits	300	300
J. Trunnell	2/3/20	3	3	Final prep for Elmore and Coleman	Deposition - Preparation	300	900
J. Trunnell	2/4/20	1	1	Travel to DWCC	DWCC Visits	300	300
J. Trunnell	2/4/20	1	1	Travel from DWCC.	DWCC Visits	300	300
J. Trunnell	2/4/20	2.5	2.5	Prep for Mays deposition.	Deposition - Preparation	300	750
J. Trunnell	2/5/20	1	1	Travel to DWCC	DWCC Visits	300	300
J. Trunnell	2/5/20	1	1	Travel from DWCC	DWCC Visits	300	300
J. Trunnell	2/5/20	4	4	Prep for Mays deposition	Deposition - Preparation	300	1200
J. Trunnell	2/6/20	1	1	Travel to DWCC	DWCC Visits	300	300
J. Trunnell	2/6/20	1	1	Travel from DWCC	DWCC Visits	300	300
J. Trunnell	2/11/20	0.5	0.5	Review of decisions on motions, debrief.	Motions	300	150
J. Trunnell	2/12/20	3	3	Dr. Seal Deposition Preparation.	Deposition - Preparation	300	900
J. Trunnell	2/13/20	1	1	Weekly DWCC case meeting	Case Management - Team Meeting	300	300
J. Trunnell	2/13/20	0.5	0.5	Drafting correspondence regarding signing of discovery	Discovery	300	150
J. Trunnell	2/14/20	6.5	6.5	Deposition Preparation visits with clients.	Deposition - Preparation	300	1950
J. Trunnell	2/14/20	1.5	1.5	Return from EHCC.	EHCC Visits	300	450
J. Trunnell	2/16/20	2.5	2.5	Document review for Deposition Preparation visits.	Deposition - Preparation	300	750
J. Trunnell	2/17/20	1.5	1.5	Travel to EHCC	EHCC Visits	300	450
J. Trunnell	2/20/20	2	2	Depositions.	Deposition	300	600
J. Trunnell	2/21/20	1.5	1.5	Deposition debrief and memo updates.	Deposition	300	450
J. Trunnell	2/26/20	4.5	4.5	Preparation for Dauzat and Hayden Deposition	Deposition - Preparation	300	1350
J. Trunnell	2/29/20	5.5	5.5	Deposition Preparation for Seal	Deposition - Preparation	300	1650
J. Trunnell	3/1/20	2.5	2.5	Deposition Preparation for Hayden and Dauzat	Deposition - Preparation	300	750
J. Trunnell	3/2/20	6.5	6.5	Travel	Travel	300	1950
J. Trunnell	3/3/20	5	5	Depositions	Deposition	300	1500
J. Trunnell	3/4/20	5.5	5.5	Deposition	Deposition	300	1650
J. Trunnell	3/5/20	1.5	1.5	Discovery response preparations.	Discovery	300	450
J. Trunnell	3/6/20	7	7	Deposition of Goodwin	Deposition	300	2100
J. Trunnell	3/6/20	6.5	6.5	Travel home	Travel	300	1950
J. Trunnell	3/10/20	0.5	0.5	Letter to the Court re scheduling.	Case Management	300	150
J. Trunnell	3/10/20	3.5	3.5	Draft of Sur-Reply	Sur-Reply	300	1050
J. Trunnell	3/10/20	2.5	2.5	Review of motion to compel	Motion to Compel	300	750
J. Trunnell	3/11/20	2.5	2.5	Interviews for vacant staff attorney position.	Staffing Matters	300	750
J. Trunnell	3/11/20	1.5	1.5	Checking discovery responses re motion to compel.	Motion to Compel	300	450
J. Trunnell	3/12/20	1.5	1.5	DWCC released client meeting: Matt Carroll	Client Meetings	300	450
J. Trunnell	3/12/20	1	1	Review of coronavirus OSEP guidance for special education services.	Covid Update	300	300
J. Trunnell	3/16/20	3.5	3.5	Review of deposition transcripts, outlining.	Deposition	300	1050
J. Trunnell	3/19/20	1.5	1.5	Review and edits on backlog of correspondence.	Case Management	300	450
J. Trunnell	3/19/20	1	1	Updating case calendar	Case Management - Planning	300	300
J. Trunnell	3/20/20	0.5	0.5	Meet and confer	Meet and Confer	300	150
J. Trunnell	4/2/20	1	1	Weekly intake meeting.	Case Management - Team Meeting	300	300
J. Trunnell	4/9/20	1	1	DWCC weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	4/9/20	0.5	0.5	Call w/ Kathy	Working with Experts	300	150
J. Trunnell	4/10/20	0.5	0.5	Update on COVID at DWCC	Covid Update	300	150
J. Trunnell	4/16/20	1	1	Weekly Call	Case Management - Team Meeting	300	300
J. Trunnell	4/20/20	1.5	1.5	Motion in limine research and writing.	Motion in Limine	300	450
J. Trunnell	4/21/20	1.5	1.5	Deposition summaries and key.	Deposition	300	450
J. Trunnell	4/23/20	1	1	Weekly case meeting.	Case Management - Team Meeting	300	300
J. Trunnell	4/24/20	1.5	1.5	Motion in limine, deposition outlining.	Motion in Limine	300	450
J. Trunnell	4/27/20	1.5	1.5	Motion in limine drafting.	Motion in Limine	300	450
J. Trunnell	5/1/20	1.5	1.5	Revisions to MIL based on ACLU comments.	Motion in Limine	300	450
J. Trunnell	5/7/20	0.5	0.5	Review of Corey Adams letter and changes to reply.	Client Communications	300	150
J. Trunnell	5/7/20	0.5	0.5	Doc review status check.	DWCC Doc Review	300	150
J. Trunnell	5/12/20	0.5	0.5	Status conference.	Status Conference	300	150
J. Trunnell	5/28/20	0.5	0.5	Email re calls to clients.	Client Communications	300	150
J. Trunnell	6/15/20	1.5	1.5	Preparing notes for deposition.	Deposition - Preparation	300	450
J. Trunnell	6/17/20	0.5	0.5	Discussion regarding reply on depo notice served without agreement on dates.	Deposition	300	150
J. Trunnell	6/18/20	0.5	0.5	Follow-up with slate.	Case Management	300	150
J. Trunnell	6/20/20	0.5	0.5	Finalizing and circulating draft to group.	Motion in Limine	300	150
J. Trunnell	6/23/20	2.5	2.5	Resolving disagreement about direction of legal argument in reply re motion in limine.	Motion in Limine	300	750
J. Trunnell	6/24/20	1.5	1.5	Finalizing and sending reply.	Case Management	300	450
J. Trunnell	6/24/20	0.5	0.5	Letter from Barbaro Hall.	Case Management	300	150
J. Trunnell	6/28/20	4.5	4.5	Deposition Preparation.	Deposition - Preparation	300	1350
J. Trunnell	6/30/20	8.5	8.5	30(b)(6) deposition of Ron Lospennato.	Deposition	300	2550
J. Trunnell	7/1/20	1	1	Check in with Katie.	Vague	300	300
J. Trunnell	7/2/20	2	2	Check in meeting regarding discovery and motion practice	Discovery	300	600
J. Trunnell	7/2/20	5.5	5.5	Drafting motion for protective order.	Motion for Protective Order	300	1650
J. Trunnell	7/8/20	2	2	Weekly meeting, discovery check in.	Case Management - Team Meeting	300	600
J. Trunnell	7/8/20	0.5	0.5	Call from client's sister.	Client Communications - Relative	300	150
J. Trunnell	7/8/20	1.5	1.5	Review and responses to correspondence.	Case Management	300	450
J. Trunnell	7/9/20	1.5	1.5	Discovery work planning.	Discovery	300	450

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	7/10/20	1.5	1.5	Discovery work planning.	Discovery	300	450
J. Trunnell	7/13/20	2.5	2.5	Revisions to motion for a protective order.	Motion for Protective Order	300	750
J. Trunnell	7/14/20	0.5	0.5	Caucusing before meet and confer.	Meet and Confer	300	150
J. Trunnell	7/14/20	4.5	4.5	Finalizing exhibits and making last changes to motion for protective order.	Motion for Protective Order	300	1350
J. Trunnell	7/16/20	2	2	DWCC case assignment and discovery meeting.	Discovery	300	600
J. Trunnell	7/20/20	1.5	1.5	Prep for deposition of LeBlanc.	Deposition - Preparation	300	450
J. Trunnell	7/22/20	2.5	2.5	Prep for LeBlanc deposition	Deposition - Preparation	300	750
J. Trunnell	7/24/20	3.5	3.5	Calls to clients. EHCC had issues with connecting clients, repeated holds. Memos memorializing same.	Client Communications	300	1050
J. Trunnell	7/27/20	1.5	1.5	Larry Jones doc review.	DWCC Doc Review	300	450
J. Trunnell	7/29/20	1.5	1.5	Review of D's filing in opposition to the protective order. Initial research.	Motion for Protective Order	300	450
J. Trunnell	7/30/20	2.5	2.5	Drafting reply to opposition to motion for protective order.	Motion for Protective Order	300	750
J. Trunnell	7/31/20	1.5	1.5	Edits to grant application, making sure Ron gets his bio in.	Case Management	300	450
J. Trunnell	7/31/20	1.5	1.5	Drafting reply on Motion for protective order.	Motion for Protective Order	300	450
J. Trunnell	8/3/20	2.5	2.5	Reply brief draft finished and circulated to team.	Case Management	300	750
J. Trunnell	8/4/20	1.5	1.5	Review of Emma's draft of the opposition for the motion to compel and for sanctions.	Motion to Compel	300	450
J. Trunnell	8/6/20	6.5	6.5	Prep for LeBlanc and Smith depositions.	Deposition - Preparation	300	1950
J. Trunnell	8/7/20	5.5	5.5	Prep for LeBlanc and Smith Depositions.	Deposition - Preparation	300	1650
J. Trunnell	8/10/20	7.5	7.5	Deposition of LeBlanc and Seth Smith. (includes off record time)	Deposition	300	2250
J. Trunnell	8/11/20	1	1	Call to expert witnesses.	Working with Experts	300	300
J. Trunnell	8/12/20	2.5	2.5	Review of letters to prisoners	Intake Letters	300	750
J. Trunnell	8/13/20	2.5	2.5	Review and edits to motion to compel.	Motion to Compel	300	750
J. Trunnell	8/17/20	1	1	Call to Haney	Working with Experts	300	300
J. Trunnell	8/17/20	4.5	4.5	Analysis of C-05 sheets.	C-05 Reports	300	1350
J. Trunnell	8/20/20	1	1	Weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	8/20/20	2.5	2.5	Drafting motion for continuance.	Motion for Continuance	300	750
J. Trunnell	8/27/20	0.5	0.5	Uploading documents from local storage into dropbox.	Case Management - Document Management	300	150
J. Trunnell	9/3/20	1	1	Weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	9/11/20	0.5	0.5	Call to Haney and Pacholke	Working with Experts	300	150
J. Trunnell	9/24/20	0.5	0.5	Coordinating dates and correspondence re settlement conference.	Settlement Conference	300	150
J. Trunnell	10/1/20	1	1	DWCC weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	10/2/20	0.5	0.5	Call to Melanie re doc review status.	DWCC Doc Review	300	150
J. Trunnell	10/2/20	1.5	1.5	Case in chief planning document.	Trial Preparation	300	450
J. Trunnell	10/6/20	1.5	1.5	Edits to individual record review assignments, call to MB.	Block Billing	300	450
J. Trunnell	10/8/20	4.5	4.5	Initials calls and research re pricing options for document review contractors.	Case Management - Document Management	300	1350
J. Trunnell	10/9/20	1	1	Meeting with ELD and MB re prison call logistics and rotation.	Case Management	300	300
J. Trunnell	10/22/20	1	1	Case meeting	Case Management - Team Meeting	300	300
J. Trunnell	10/22/20	1	1	Oral argument moot.	Oral Argument	300	300
J. Trunnell	10/26/20	1.5	1.5	Updates re work plan, contractors, and document review progress.	Case Management - Planning	300	450
J. Trunnell	10/27/20	0.5	0.5	Debrief from status conference.	Status Conference	300	150
J. Trunnell	10/27/20	1	1	Call to MB and Emma re DWCC expert call.	Working with Experts	300	300
J. Trunnell	10/30/20	4.5	4.5	Drafting reply to D's opposition re 30(b)(6).	30(b)(6) Deposition	300	1350
J. Trunnell	11/3/20	3.5	3.5	Review of Blanchard Records in FM.	Case Management	300	1050
J. Trunnell	11/5/20	1	1	Weekly case status meeting.	Case Management - Team Meeting	300	300
J. Trunnell	11/6/20	1	1	Meeting regarding work plan and case management structure.	Case Management - Planning	300	300
J. Trunnell	11/11/20	0.5	0.5	Call to Melanie regarding new co-counsel and meeting.	Case Management	300	150
J. Trunnell	11/11/20	0.5	0.5	Introductory call with new co-counsel.	Case Management	300	150
J. Trunnell	11/11/20	2	2	Review of letters and call to Leah regarding suicide of James Doyle.	Client Communications	300	600
J. Trunnell	11/12/20	1	1	Review of notes on client.			
J. Trunnell	11/12/20	1	1	Weekly intake meeting.	Case Management - Team Meeting	300	300
J. Trunnell	11/12/20	0.5	0.5	Call to Emma regarding continuity of contacts with MacArthur.	Case Management	300	150
J. Trunnell	1/14/21	1	1	Weekly case meeting.	Case Management - Team Meeting	300	300
J. Trunnell	1/19/21	2.5	2.5	Review of ARPs.	Administrative Remedy Procedure	300	750
J. Trunnell	1/21/21	1	1	Weekly case meeting	Case Management - Team Meeting	300	300
J. Trunnell	1/21/21	0.5	0.5	Follow-up with Emma and Melanie regarding ARP review.	Administrative Remedy Procedure	300	150
J. Trunnell	1/22/21	2	2	Review of ARPs	Administrative Remedy Procedure	300	600
J. Trunnell	1/25/21	1.5	1.5	Research on SDT and privilege issues. Email to team.	Case Management	300	450
J. Trunnell	1/25/21	2	2	ARP document review.	Administrative Remedy Procedure	300	600
J. Trunnell	1/26/21	0.5	0.5	Email regarding letter about adequacy of counsel in unrelated civil case. Clarified that writer was dissatisfied with his previous attorney and was forwarding letters to us in hope that we would take over rep.	Case Management	300	150
J. Trunnell	1/26/21	1.5	1.5	Document review.	DWCC Doc Review	300	450
J. Trunnell	1/27/21	2.5	2.5	ARP reviews.	Administrative Remedy Procedure	300	750
J. Trunnell	1/27/21	1.5	1.5	Review of DRMS report on prison conditions in Mississippi, incl overlap on solitary confinement work.	Case Management	300	450
J. Trunnell	1/28/21	1	1	Weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	1/29/21	0.5	0.5	Meeting on ARP review progress.	Administrative Remedy Procedure	300	150
J. Trunnell	2/2/21	4.5	4.5	Document review for Jabari Williams.	DWCC Doc Review	300	1350
J. Trunnell	2/3/21	8	8	Review of Jabari Williams, call to MB regarding Jabbar Williams records intermingled.	Case Matters	300	2400
J. Trunnell	2/8/21	1.5	1.5	Doc review.	DWCC Doc Review	300	450
J. Trunnell	2/11/21	1	1	Weekly case meeting.	Case Management - Team Meeting	300	300
J. Trunnell	2/15/21	0.5	0.5	DWCC follow-up with Emma regarding history of AVP, discrepancies	Case Management	300	150
J. Trunnell	2/17/21	3.5	3.5	Doc review re Williams.	DWCC Doc Review	300	1050
J. Trunnell	2/22/21	2	2	Document review, Johnny Williams	DWCC Doc Review	300	600
J. Trunnell	2/24/21	1	1	Meeting regarding depo prep.	Deposition - Preparation	300	300
J. Trunnell	2/25/21	1	1	DWCC weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	3/2/21	4	4	Document review, Johnny Williams.	DWCC Doc Review	300	1200
J. Trunnell	3/9/21	1	1	Meeting regarding Deposition Preparation.	Deposition - Preparation	300	300
J. Trunnell	3/11/21	1	1	Weekly meeting	Case Management - Team Meeting	300	300
J. Trunnell	3/11/21	5.5	5.5	Deposition Preparation for Harvey / Richmond.	Deposition - Preparation	300	1650
J. Trunnell	3/15/21	6	6	Deposition of Harvey, 9-3pm (conferencing during breaks)	Deposition	300	1800
J. Trunnell	3/18/21	1	1	Weekly case call.	Case Management - Team Meeting	300	300
J. Trunnell	3/18/21	1.5	1.5	Finalizing first draft of Richmond questions.	Trial Preparation	300	450
J. Trunnell	3/22/21	1	1	Call with Dan Pacholke	Working with Experts	300	300
J. Trunnell	3/22/21	2	2	Call with Dr. Burns.	Working with Experts	300	600
J. Trunnell	3/22/21	3.5	3.5	Prep for deposition of Richmond.	Deposition - Preparation	300	1050
J. Trunnell	3/22/21	1.5	1.5	Privilege log for expert emails.	Working with Experts	300	450
J. Trunnell	3/23/21	7.5	7.5	Pacholke deposition.	Deposition	300	2250
J. Trunnell	3/24/21	7	7	Burns Deposition.	Deposition	300	2100
J. Trunnell	3/25/21	1	1	Weekly case meeting.	Case Management - Team Meeting	300	300
J. Trunnell	3/25/21	1.5	1.5	Privilege log for expert correspondence.	Working with Experts	300	450
J. Trunnell	3/30/21	1	1	Meeting regarding prep for status conference.	Status Conference	300	300
J. Trunnell	3/30/21	1.5	1.5	Research and prep for meeting regarding case strategy for status conference.	Status Conference	300	450
J. Trunnell	4/1/21	1	1	Weekly case meeting.	Case Management - Team Meeting	300	300

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	4/5/21	5.5	5.5	Haney deposition.	Deposition	300	1650
J. Trunnell	4/7/21	1.5	1.5	Reading Harvey deposition.	Deposition	300	450
J. Trunnell	4/8/21	1	1	DWCC weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	4/14/21	1.5	1.5	Document review, privilege log	DWCC Doc Review	300	450
J. Trunnell	4/15/21	1	1	Weekly DWCC meeting.	Case Management - Team Meeting	300	300
J. Trunnell	4/22/21	1.5	1.5	Weekly case check-in meeting.	Case Management - Team Meeting	300	450
J. Trunnell	4/26/21	1.5	1.5	Review of Motion in Limine	Motion in Limine	300	450
J. Trunnell	4/29/21	1	1	Weekly case meeting.	Case Management - Team Meeting	300	300
J. Trunnell	5/3/21	1	1	Letter review and correspondence to inmates.	Intake Letters	300	300
J. Trunnell	5/10/21	3.5	3.5	Legal research and Mikey Harvey section of Motion in Limine brief.	Motion in Limine	300	1050
J. Trunnell	5/12/21	4.5	4.5	Michael Harvey and legal research on Motion in Limine motion.	Motion in Limine	300	1350
J. Trunnell	5/13/21	1	1	Weekly team meeting.	Case Management - Team Meeting	300	300
J. Trunnell	5/16/21	7.5	7.5	REvisions to Motion in Limine brief, responding to comments.	Motion in Limine	300	2250
J. Trunnell	5/19/21	2.5	2.5	Prep for meet and confer.	Meet and Confer	300	750
J. Trunnell	5/20/21	1	1	Weekly check in meeting.	Case Management - Team Meeting	300	300
J. Trunnell	5/20/21	0.5	0.5	Debrief from meet and confer.	Meet and Confer	300	150
J. Trunnell	5/21/21	1	1	Call to client ahead of settlement conference.	Settlement Conference	300	300
J. Trunnell	5/21/21	3	3	Preparing documents and reviewing ACA ahead of trip.	Settlement Conference	300	900
J. Trunnell	5/24/21	2	2	Call to clients re settlement conference.	Settlement Conference	300	600
J. Trunnell	5/24/21	5	5	Travel up to Monroe.	Settlement Conference	300	1500
J. Trunnell	5/25/21	10	10	Mediation, arrived 8:30, departed 6:30. Caucus at lunch.	Settlement Conference	300	3000
J. Trunnell	5/25/21	1	1	Debrief and homework from mediation.	Settlement Conference	300	300
J. Trunnell	5/26/21	3	3	Mediation 8:30-11:30	Settlement Conference	300	900
J. Trunnell	5/26/21	5	5	Travel back to office, trial planning.	Trial Preparation	300	1500
J. Trunnell	5/27/21	0.5	0.5	Mediation debrief meeting.	Settlement Conference	300	150
J. Trunnell	5/27/21	0.5	0.5	Call to Locke Bowman, scheduling appointments, fu email.	Working with Experts	300	150
J. Trunnell	5/27/21	1.5	1.5	MSJ research on ADA.	Motion for Summary Judgement - ADA & RA	300	450
J. Trunnell	6/3/21	1	1	MSJ prep meeting.	Motion for Summary Judgement	300	300
J. Trunnell	6/10/21	1	1	Weekly check-in meeting.	Case Management - Team Meeting	300	300
J. Trunnell	6/10/21	5.5	5.5	Client stories for MSJ	Motion for Summary Judgement	300	1650
J. Trunnell	6/15/21	0.5	0.5	Logistics and set-up for call to Brooks.	Case Management	300	150
J. Trunnell	6/16/21	1	1	Call with expert witnesses.	Working with Experts	300	300
J. Trunnell	6/16/21	1	1	Call to Ronald Brooks.	Case Management	300	300
J. Trunnell	6/16/21	1.5	1.5	Follow-up research on Motion in Limine based on conversation with experts.	Motion in Limine	300	450
J. Trunnell	6/20/21	3.5	3.5	Drafting initial outline of response to ADA MSJ.	Motion for Summary Judgement - ADA & RA	300	1050
J. Trunnell	6/29/21	1	1	Call with Fathi	Vague	300	300
J. Trunnell	7/1/21	1	1	Weekly meeting	Case Management - Team Meeting	300	300
J. Trunnell	7/1/21	4.5	4.5	Drafting ADA opposition.	Motion for Summary Judgement - ADA & RA	300	1350
J. Trunnell	7/2/21	6.5	6.5	Drafting ADA opposition.	Motion for Summary Judgement - ADA & RA	300	1950
J. Trunnell	7/7/21	1	1	Call with Emma, Katie, Mel regarding plan.	Case Management	300	300
J. Trunnell	7/8/21	1	1	Weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	7/16/21	2.5	2.5	Motion in Limine hearing prep, direct questioning and review of D's briefs.	Motion in Limine	300	750
J. Trunnell	7/21/21	6.5	6.5	ADA opposition brief, research and drafting.	Motion for Summary Judgement - ADA & RA	300	1950
J. Trunnell	7/22/21	1	1	Weekly case meeting.	Case Management - Team Meeting	300	300
J. Trunnell	7/23/21	6	6	Courtesy copies printed and organized and tabbed.	Vague	300	1800
J. Trunnell	7/23/21	1.5	1.5	Finalizing and filing ADA MSJ sur-reply.	Motion for Summary Judgement - ADA & RA	300	450
J. Trunnell	7/23/21	3.5	3.5	Motion in Limine hearing prep in light of Foote's order, re-reading D's brief.	Motion in Limine	300	1050
J. Trunnell	7/25/21	1	1	Call with all experts	Working with Experts	300	300
J. Trunnell	7/25/21	1	1	Call with Mikey	Vague	300	300
J. Trunnell	7/26/21	2	2	Hearing on Motion in Limine motion.	Motion in Limine Hearing	300	600
J. Trunnell	7/28/21	4.5	4.5	Surprey draft review and finishing sections assigned to me.	Sur-Reply	300	1350
J. Trunnell	7/29/21	1	1	Weekly case check in.	Case Management - Team Meeting	300	300
J. Trunnell	8/9/21	3	3	Witness proof charting meeting.	Working with Witnesses	300	900
J. Trunnell	8/12/21	1.5	1.5	Weekly case meeting.	Case Management - Team Meeting	300	450
J. Trunnell	8/12/21	5.5	5.5	Prep on individual items on Defendants' list. Research into 5th Cir. Standards for re-opening discovery.	Appeal of Class Certification	300	1650
J. Trunnell	8/15/21	1.5	1.5	Moot for status conference.	Status Conference	300	450
J. Trunnell	8/19/21	2	2	Weekly case meeting.	Case Management - Team Meeting	300	600
J. Trunnell	8/19/21	2.5	2.5	Discovery asks re brief in opposition.	Discovery	300	750
J. Trunnell	8/22/21	1.5	1.5	Prep for status conference.	Status Conference	300	450
J. Trunnell	8/22/21	1.5	1.5	Moot status conference.	Status Conference	300	450
J. Trunnell	8/24/21	2.5	2.5	Fact/proof charting and trial plan.	Trial Preparation	300	750
J. Trunnell	8/26/21	1	1	Status conference.	Status Conference	300	300
J. Trunnell	8/30/21	1	1	Call with experts regarding remedial phase.	Working with Experts	300	300
J. Trunnell	8/31/21	5.5	5.5	Calls to DWCC, rough memos	Case Matters	300	1650
J. Trunnell	9/2/21	0.5	0.5	Call to M Snider	Vague	300	150
J. Trunnell	9/9/21	1	1	DWCC case meeting	Case Management	300	300
J. Trunnell	9/10/21	0.5	0.5	Meet and confer	Meet and Confer	300	150
J. Trunnell	9/14/21	1.5	1.5	Logistical discussion on remedial phase, continued.	Case Management - Planning	300	450
J. Trunnell	9/20/21	2	2	Review of DWCC class certification decision. Discussion of same with team.	Class Certification	300	600
J. Trunnell	9/20/21	1	1	Prep for status conference	Status Conference	300	300
J. Trunnell	9/22/21	5.5	5.5	Witness selection conversation	Working with Witnesses	300	1650
J. Trunnell	9/23/21	2.5	2.5	Client summaries.	Case Management	300	750
J. Trunnell	10/5/21	4	4	Review of DWCC non-deposed client files.	Deposition	300	1200
J. Trunnell	10/8/21	0.5	0.5	Call with Emma re sheets.	Case Management	300	150
J. Trunnell	10/10/21	4.5	4.5	Edits and revisions to opposition to request for review in 5th circuit	Appeal of Class Certification	300	1350
J. Trunnell	10/11/21	2.5	2.5	Edits and revisions to opposition to request for review/stay.	Case Management	300	750
J. Trunnell	10/12/21	2.5	2.5	Review of Burns documents.	Working with Experts	300	750
J. Trunnell	10/15/21	1	1	Review of letters from clients.	Client Communications	300	300
J. Trunnell	10/26/21	3	3	Exhibit prep.	Trial Exhibits	300	900
J. Trunnell	10/26/21	3	3	Exhibits and PTO meeting with Emma and Melanie, working meeting w/ exhibit prep.	Trial Exhibits	300	900
J. Trunnell	10/28/21	1.5	1.5	DWCC weekly meeting.	Case Management - Team Meeting	300	450
J. Trunnell	10/29/21	5.5	5.5	Exhibits and pretrial order.	Trial Exhibits	300	1650
J. Trunnell	10/30/21	3.5	3.5	Review of pretrial order.	Pre-Trial Orders	300	1050
J. Trunnell	11/2/21	3.5	3.5	Preparation for Burns' direct	Working with Witnesses	300	1050
J. Trunnell	11/3/21	3.5	3.5	Research re spoliation and motion in limine.	Motion in Limine	300	1050
J. Trunnell	11/5/21	3.5	3.5	Marking exhibit documents in system, identifying documents to be marked into system.	Trial Exhibits	300	1050
J. Trunnell	11/8/21	2	2	Drafting MILs.	Motion in Limine	300	600
J. Trunnell	11/9/21	1.5	1.5	Review of D's revisions to JPOT	Joint Pre Trial Conference (JPOT)	300	450
J. Trunnell	11/10/21	4.5	4.5	Prep for meet and confer re JPOT.	Joint Pre Trial Conference (JPOT)	300	1350
J. Trunnell	11/10/21	5	5	Edits to JPOT and consolidation of problems with D's list.	Joint Pre Trial Conference (JPOT)	300	1500
J. Trunnell	11/11/21	1	1	DWCC weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	11/11/21	2.5	2.5	Meet and confer.	Meet and Confer	300	750
J. Trunnell	11/12/21	5.5	5.5	Motion in limine drafting.	Motion in Limine	300	1650
J. Trunnell	11/14/21	3.5	3.5	Motion in Limine drafting	Motion in Limine	300	1050

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	11/17/21	4.5	4.5	Prep for Goodwin cross.	Trial Preparation	300	1350
J. Trunnell	11/24/21	4.5	4.5	Log book synthesizing w/ notes, culling to most relevant examples.	Case Management	300	1350
J. Trunnell	11/26/21	4.5	4.5	Exhibit culling.	Trial Exhibits	300	1350
J. Trunnell	12/1/21	5.5	5.5	Final exhibit culling.	Trial Exhibits	300	1650
J. Trunnell	12/2/21	1	1	DWCC weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	12/3/21	1.5	1.5	Meeting w/ Emma re FFCL, review of examples.	FFCL	300	450
J. Trunnell	12/6/21	4.5	4.5	Responding to edits/comments for reply to D's opposition, brief drafting.	Motion in Limine	300	1350
J. Trunnell	12/7/21	2.5	2.5	Exhibits and finalizing reply to D's opposition.	Trial Exhibits	300	750
J. Trunnell	12/7/21	3.5	3.5	Visit to Adams and Reese re trial logistics.	Motion for Summary Judgement - ADA & RA	300	1050
J. Trunnell	12/9/21	6.5	6.5	Trial prep meeting, witness order and narrative.	Trial Preparation	300	1950
J. Trunnell	12/14/21	1.5	1.5	Call to Brooks, f/u with PJ	Case Management	300	450
J. Trunnell	12/16/21	4	4	Status conference.	Status Conference	300	1200
J. Trunnell	12/16/21	1.5	1.5	Review of Haney report and Liman survey.	Working with Experts	300	450
J. Trunnell	12/17/21	2.5	2.5	Drafting objection to Liman study.	Case Management	300	750
J. Trunnell	12/21/21	2.5	2.5	Responding to edits, discussing strategy of Liman report.	Liman Report	300	750
J. Trunnell	12/23/21	5.5	5.5	Huff cross prep.	Trial Preparation	300	1650
J. Trunnell	12/26/21	4	4	Meeting re witness timings and order.	Trial Preparation	300	1200
J. Trunnell	12/26/21	2.5	2.5	Opposition re class contact.	Class Certification	300	750
J. Trunnell	12/27/21	5	5	Summary of ADA claims.	Motion for Summary Judgement - ADA & RA	300	1500
J. Trunnell	12/28/21	1.5	1.5	Call to Dr. Burns.	Working with Experts	300	450
J. Trunnell	12/28/21	3.5	3.5	Summary of ADA claims, review of remainder.	Motion for Summary Judgement - ADA & RA	300	1050
J. Trunnell	12/29/21	3.5	3.5	Summary of ADA claims, review of remainder of claims summary.	Motion for Summary Judgement - ADA & RA	300	1050
J. Trunnell	12/30/21	5.5	5.5	Pre-trial memo revisions and finalization.	Trial Preparation	300	1650
J. Trunnell	1/4/22	0.5	0.5	Status conference with court re witness ordering.	Status Conference	300	150
J. Trunnell	1/6/22	2.5	2.5	Weekly case meeting.	Case Management - Team Meeting	300	750
J. Trunnell	1/7/22	4.5	4.5	Prep for cross.	Trial Preparation	300	1350
J. Trunnell	1/12/22	1.5	1.5	Edits to pill pass questioning.	Pill Call	300	450
J. Trunnell	1/14/22	4.5	4.5	Revisions to Huff.	Working with Experts	300	1350
J. Trunnell	1/16/22	6.5	6.5	Edits to Huff and Goodwin.	Working with Experts	300	1950
J. Trunnell	1/17/22	4.5	4.5	Edits to Huff and Goodwin.	Working with Experts	300	1350
J. Trunnell	1/17/22	1.5	1.5	Final call with Kathy.	Working with Experts	300	450
J. Trunnell	2/10/22	1.5	1.5	Weekly meeting.	Case Management - Team Meeting	300	450
J. Trunnell	2/10/22	1	1	Review of letters.	Intake Letters	300	300
J. Trunnell	2/17/22	1	1	Weekly meeting.	Case Management - Team Meeting	300	300
J. Trunnell	2/24/22	5.5	5.5	FFCL summaries.	FFCL	300	1650
J. Trunnell	2/28/22	0.5	0.5	Call re FFCL.	FFCL	300	150
J. Trunnell	3/2/22	1.5	1.5	FFCL review, edits.	FFCL	300	450
J. Trunnell	3/9/22	8.5	8.5	FFCL edits, continued.	FFCL	300	2550
J. Trunnell	3/10/22	1	1	Weekly case checkin.	Case Management - Team Meeting	300	300
J. Trunnell	3/11/22	10.5	10.5	FFCL	FFCL	300	3150
J. Trunnell	3/13/22	14.5	14.5	FFCL, live edits and additional facts pulled for summaries.	FFCL	300	4350
J. Trunnell	3/29/22	1.5	1.5	Calls to clients.	Client Communications	300	450
J. Trunnell	3/31/22	1.5	1.5	Weekly case meeting.	Case Management - Team Meeting	300	450
J. Trunnell	4/6/22	0.5	0.5	Call to MJC.	Vague	300	150
E. Douglas	4/13/20	4	4	Doc review	DWCC Doc Review	250	1000
E. Douglas	4/15/20	3	3	Doc Review	DWCC Doc Review	250	750
E. Douglas	4/16/20	1	1	DWCC Weekly meeting	Case Management - Team Meeting	250	250
E. Douglas	4/22/20	0.5	0.5	Meeting w/ JT and MB re: action plan for document review	Case Management	250	125
E. Douglas	5/4/20	3	3	Doc Review to prepare for expert reports	Working with Experts	250	750
E. Douglas	5/8/20	1	1	Doc Review	DWCC Doc Review	250	250
E. Douglas	5/21/20	1	1	Weekly check in	Case Management - Team Meeting	250	250
E. Douglas	6/4/20	3.5	3.5	Doc review to get ready for experts	Working with Experts	250	875
E. Douglas	6/5/20	3.5	3.5	Doc Review in preparation for expert reports	Working with Experts	250	875
E. Douglas	6/18/20	1	1	Weekly Check in	Case Management - Team Meeting	250	250
E. Douglas	6/22/20	0.5	0.5	Deposition Preparation Meeting w/ Ron and Jon	Deposition - Preparation	250	125
E. Douglas	6/22/20	3	3	Document Review for Experts	Working with Experts	250	750
E. Douglas	6/23/20	3	3	Editing Reply brief to Defendant's response to Motion in Limine	Motion in Limine	250	750
E. Douglas	6/28/20	6.5	6.5	Creating an overview of client for Ron's Deposition Preparation.	Deposition - Preparation	250	1625
E. Douglas	6/29/20	4	4	Deposition Preparationanation - [topic redacted]	Deposition - Preparation	250	1000
E. Douglas	7/2/20	3	3	Research for continuation of deposition and Motion for Protective order	Motion for Protective Order	250	750
E. Douglas	7/7/20	1	1	Review of Lospenatto deposition	Deposition	250	250
E. Douglas	7/8/20	2	2	DWCC Weekly meeting	Case Management - Team Meeting	250	500
E. Douglas	7/8/20	1	1	Meeting re: Protective order	Motion for Protective Order	250	250
E. Douglas	7/10/20	1	1	Editing MISO	Case Management	250	250
E. Douglas	7/14/20	1	1	Editing MISO	Case Management	250	250
E. Douglas	7/14/20	0.5	0.5	Meeting re: Meet and Confer	Meet and Confer	250	125
E. Douglas	7/31/20	5.5	5.5	Working on motion and memo in opposition to motion to compel	Motion to Compel	250	1375
E. Douglas	8/3/20	3.5	3.5	Drafting memo in objection to motion to compel	Motion to Compel	250	875
E. Douglas	8/6/20	1	1	Weekly Meeting	Case Management - Team Meeting	250	250
E. Douglas	8/7/20	1	1	Meet and Confer and debrief	Meet and Confer	250	250
E. Douglas	8/7/20	3.5	3.5	Deposition questions for Leblanc and Seth Smith	Deposition	250	875
E. Douglas	8/8/20	3.5	3.5	Preparing for depositions of Leblanc and Smith	Deposition - Preparation	250	875
E. Douglas	8/9/20	8.5	8.5	Preparing for the depositions of Seth Smith and Sec. Leblanc	Deposition - Preparation	250	2125
E. Douglas	8/10/20	8	8	Depositions of Seth Smith and Sec. Leblanc	Deposition	250	2000
E. Douglas	8/14/20	0.5	0.5	Meet and confer follow up on outanding discovery items	Discovery	250	125
E. Douglas	8/20/20	1	1	Weekly meeting	Case Management - Team Meeting	250	250
E. Douglas	8/20/20	0.5	0.5	Drafting sur-reply to D's motion to compel and for sanctions	Motion to Compel	250	125
E. Douglas	8/26/20	1	1	Reviewing and filing sur-reply	Sur-Reply	250	250
E. Douglas	8/27/20	0.5	0.5	Editing joint motion to continue	Motion to Continue	250	125
E. Douglas	8/27/20	4.5	4.5	Document review for expert witnesses	Working with Experts	250	1125
E. Douglas	9/3/20	1	1	Weekly Team meeting	Case Management - Team Meeting	250	250
E. Douglas	9/9/20	0.5	0.5	Reviewing photos for expert witnesses	Working with Experts	250	125
E. Douglas	9/9/20	1	1	Reviewing letters from prisoners	Intake Letters	250	250
E. Douglas	9/11/20	2	2	Legal research for protective order	Motion for Protective Order	250	500
E. Douglas	9/12/20	6.5	6.5	Review of photos for experts	Working with Experts	250	1625
E. Douglas	9/15/20	4.5	4.5	Reviewing photos for experts	Working with Experts	250	1125
E. Douglas	9/17/20	1	1	Reviewing response to 4th motion to compel	Motion to Compel	250	250
E. Douglas	9/23/20	0.5	0.5	Scheduling Conf	Scheduling Conference	250	125
E. Douglas	9/30/20	2	2	Research for appeal	Appeal - Magistrate	250	500
E. Douglas	10/2/20	7	7	Editing appeal	Appeal - Magistrate	250	1750
E. Douglas	10/5/20	2	2	Meeting Re: discovery process	Discovery	250	500
E. Douglas	10/5/20	2	2	Meeting re: discovery work plan	Discovery	250	500
E. Douglas	10/8/20	2	2	Doc Review	DWCC Doc Review	250	500
E. Douglas	10/12/20	1	1	Working on doc review work plan	DWCC Doc Review	250	250
E. Douglas	10/14/20	3	3	Creating work plan for Doc review new hires	Case Management - Planning	250	750
E. Douglas	10/19/20	3	3	DOC review (3)	DWCC Doc Review	250	750
E. Douglas	10/21/20	0.5	0.5	Uploading files	Case Management - Document Management	250	125
E. Douglas	10/22/20	2	2	Adding filed to flash drives	Case Management - Document Management	250	500
E. Douglas	10/26/20	1	1	Call with melanie re: Doc Upload	Case Management - Technology Issues	250	250

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
E. Douglas	11/3/20	3	3	Editing Reply to Appeal (3)	Appeal - Magistrate	250	750
E. Douglas	11/5/20	1	1	Weekly Meeting	Case Management - Team Meeting	250	250
E. Douglas	11/6/20	4.5	4.5	DWCC Doc Review	DWCC Doc Review	250	1125
E. Douglas	11/11/20	0.5	0.5	Meet and greet with private counsel for class certification	Class Certification	250	125
E. Douglas	11/11/20	2	2	Editing letters to clients	Client Communications	250	500
E. Douglas	11/12/20	0.5	0.5	Weekly Team meeting	Case Management - Team Meeting	250	125
E. Douglas	11/12/20	0.5	0.5	Meeting w/ Jon re: arrangement with Macarthur	Case Management	250	125
E. Douglas	11/12/20	0.5	0.5	Meeting with Melanie re: Discovery issues	Discovery	250	125
E. Douglas	11/13/20	2	2	DWCC Doc Review	DWCC Doc Review	250	500
E. Douglas	11/17/20	1.5	3.5	Editing and approving letters to clients (1.5)	Client Communications	250	875
E. Douglas	11/19/20	1	1	Reviewing doc review for accuracy and to make sure the doc upload team is working on what they should be, clarifying doc review assignments with doc review team	Staffing Matters	250	250
E. Douglas	11/23/20	5	5	Doc Review	DWCC Doc Review	250	1250
E. Douglas	11/23/20	0.5	0.5	Emails with the team re: doc review and upload plans	Case Management - Planning	250	125
E. Douglas	11/24/20	3	3	Document Uploading	Case Management - Document Management	250	750
E. Douglas	11/25/20	1	1	Phone call with Craig Haney / MB	Working with Experts	250	250
E. Douglas	11/25/20	0.5	0.5	PC w/ Melanie Bray re: discovery	Discovery	250	125
E. Douglas	11/25/20	2	2	Doc review - DWCC	DWCC Doc Review	250	500
E. Douglas	11/25/20	0.5	0.5	Conversation w/ KS re: doc upload plan doc review	Case Management - Planning	250	125
E. Douglas	11/25/20	3	3	Doc Review - managing files to be uploaded	Staffing Matters	250	750
E. Douglas	11/30/20	7	7	Doc Review - Managing uploads transferring files to the doc upload team - Document Review	DWCC Doc Review	250	1750
E. Douglas	12/2/20	3.5	3.5	Document Review	DWCC Doc Review	250	875
E. Douglas	12/7/20	4.5	4.5	Doc Review - Reviewing Noel Dean's Records in Filemaker	DWCC Doc Review	250	1125
E. Douglas	11/17/20	2	2	Doc Review (2)	DWCC Doc Review	250	500
E. Douglas	12/11/20	0.5	0.5	Meeting with Document uploaders (.5)	Case Management - Technology Issues	250	125
E. Douglas	12/22/20	3	3	Document Review	DWCC Doc Review	250	750
E. Douglas	1/3/21	7	7	Deposition Preparation (Preparation for moot with Ron, moot with Ron and the team)	Deposition - Preparation	250	1750
E. Douglas	1/5/21	7	7	30(b)(6) Deposition of Ron	Deposition	250	1750
E. Douglas	1/6/21	4.5	4.5	Reviewing expert Reports(4.5)	Working with Experts	250	1125
E. Douglas	1/7/21	3	3	Reviewing Kathy Burns Expert report (3)	Working with Experts	250	750
E. Douglas	1/7/21	1	1	Meeting w/ Experts (1)	Working with Experts	250	250
E. Douglas	1/7/21	1	1	Filemaker meeting w/ Ron and Carly and Mel (1)	Case Management - Technology Issues	250	250
E. Douglas	1/8/21	1	1	Reviewing SLATE's draft expert report - making comments/ sending to team	Working with Experts	250	250
E. Douglas	1/11/21	8	8	Working on final drafts of expert reports	Working with Experts	250	2000
E. Douglas	1/13/21	0.5	0.5	Team meeting (.5)	Case Management - Team Meeting	250	125
E. Douglas	1/13/21	1	1	Meeting with Melanie re: division of labor (1)	Case Management - Planning	250	250
E. Douglas	1/15/21	0.5	0.5	Meetin w/ Melanie re: distribution of labor (.5)	Case Management	250	125
E. Douglas	1/15/21	1	1	Meeting with Mel and Katie re: depositions (1)	Deposition	250	250
E. Douglas	1/19/21	1	1	Meeting to prepare for work of depositions (1)	Deposition - Preparation	250	250
E. Douglas	1/20/21	3.5	3.5	Doc Review	DWCC Doc Review	250	875
E. Douglas	1/21/21	1	1	Weekly meeting (1)	Case Management - Team Meeting	250	250
E. Douglas	1/21/21	2	2	DWCC Doc Review (2)	DWCC Doc Review	250	500
E. Douglas	1/22/21	3	3	Doc Review	DWCC Doc Review	250	750
E. Douglas	1/25/21	1	1	Meeting to prepare for work of depositions (1)	Deposition - Preparation	250	250
E. Douglas	1/27/21	0.5	0.5	Approval of letters (.5)	Case Management	250	125
E. Douglas	1/28/21	1	5.5	Weekly meeting (1) Emails following up on meeting agenda items (1)	Time Entry Issue	250	1375
E. Douglas	2/3/21	7	7	Reviewing Haney's notes for privileged information (.5) DWCC Management meeting (1) Doc Review (2.5) Doc Review (4.5) Looking for Haney's publications - emailing colleagues with access to databases compiling list of publications that we cannot find (1) Reading Dan Pacholke's publications to prepare for deposition defense ----- Drafting deposition defense Questions.	Time Entry Issue	250	1750
E. Douglas	2/4/21	1	1	Weekly meeting (1)	Case Management - Team Meeting	250	250
E. Douglas	2/4/21	1	1	Looking up documents from the Lewis v. Cain litigation to prepare for deposition (1)	Deposition - Preparation	250	250
E. Douglas	2/10/21	2	2	Research on James Upchurch for Deposition Preparation(2)	Deposition - Preparation	250	500
E. Douglas	2/12/21	1	1	Doc review	DWCC Doc Review	250	250
E. Douglas	2/13/21	4	4	Document Review	DWCC Doc Review	250	1000
E. Douglas	2/15/21	6	6	Document Review	DWCC Doc Review	250	1500
E. Douglas	2/16/21	1	1	Document Review	DWCC Doc Review	250	250
E. Douglas	2/17/21	1	1	Reviewing letters from clients	Client Communications	250	250
E. Douglas	2/22/21	0.5	0.5	Meeting w/ Lee re: gathering materials for Dr. Seal depo (.5)	Deposition	250	125
E. Douglas	2/24/21	1	1	Meeting re: strategy for expert depositions (1)	Deposition	250	250
E. Douglas	3/4/21	4	4	Morning meeting (.8) Emailing w/ team re: scheduling, depositions (3)	Time Entry Issue	250	1000
E. Douglas	3/9/21	2	2	Transferring data to hard drive (2.9)	Case Management	250	500
E. Douglas	3/11/21	3	3	Strategy session (2)	Deposition - Preparation	250	750
E. Douglas	3/18/21	1	1	Deposition Preparation(2) Upchurch (3)	Case Management - Team Meeting	250	250
E. Douglas	3/19/21	2	2	Weekly meeting (1)	Deposition - Preparation	250	500
E. Douglas	3/22/21	1	1	Depo Prep (2)	Deposition - Preparation	250	250
E. Douglas	3/22/21	0.5	0.5	Working on Deposition Preparation questions (1)	Deposition - Preparation	250	125
E. Douglas	3/23/21	8.5	8.5	Preparing for final depo prep call with Dan (.5)	Deposition - Preparation	250	2125
E. Douglas	3/24/21	5	5	Deposition of Dan Pacholke (8.5)	Deposition	250	1250
E. Douglas	3/24/21	2	2	Deposition of Kathy Burns	Deposition	250	500
E. Douglas	3/25/21	1	1	Preparing for Upchurch Deposition	Deposition - Preparation	250	250
E. Douglas	3/25/21	0.5	0.5	DWCC weekly meeting (1)	Case Management - Team Meeting	250	125
E. Douglas	3/25/21	0.5	0.5	Meeting w/ Melanie re: DWCC lead counsel duties (.5)	Case Management	250	125
E. Douglas	3/25/21	0.5	0.5	Editing motion and MISO for discovery issues and expedited time line (.5)	Discovery	250	125
E. Douglas	3/26/21	6	6	Deposition of Michael Richmond (6)	Deposition	250	1500
E. Douglas	4/1/21	1	1	DWCC Weekly team meeting (1)	Case Management - Team Meeting	250	250
E. Douglas	4/1/21	2	2	Deposition Preparation for Upchurch (2)	Deposition - Preparation	250	500
E. Douglas	4/1/21	0.5	0.5	Status conference (.5)	Status Conference	250	125
E. Douglas	4/1/21	6	6	Depo prep for upchurch (6)	Deposition - Preparation	250	1500
E. Douglas	4/9/21	1	1	Meeting re: Lead Counsel stuff and responsibility allocation in DWCC	Case Management	250	250
E. Douglas	4/13/21	7.5	7.5	Reviewing settlement agreement - comparing with the ACA 5th Edition, comparing with the new policy from DPSC - preparing for settlement agreement discussions.	Settlement Agreement	250	1875
E. Douglas	4/16/21	1	1	Conversation w/ Melanie re: calls for next week and other DWCC management details.	Case Management	250	250
E. Douglas	4/20/21	1	1	Zoom call with ronald two clients (1)	Client Communications	250	250
E. Douglas	4/21/21	3	3	Doc review of Bruce Charles (3)	Client Communications	250	750
E. Douglas	4/21/21	3	3	Review of Rodney Long's Deposition (3)	Deposition	250	750
E. Douglas	4/22/21	2	2	Weekly meeting (2)	Case Management - Team Meeting	250	500

Detailed Time Entries - Half-Hour Increments							Exhibit 1	
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total	
E. Douglas	4/22/21	4.5	4.5	Editing class certification brief (4.5)	Class Certification	250	1125	
E. Douglas	4/23/21	3	3	Reviewing depositions (3)	Deposition	250	750	
E. Douglas	4/26/21	0.5	0.5	Drafting memo to file re: call with experts (.5)	Working with Experts	250	125	
E. Douglas	4/26/21	0.5	0.5	Finishing memo from call with CT on Friday, sending to MB (.5)	Case Management	250	125	
E. Douglas	5/4/21	4	4	Drafting Pacholke section of response to Motion in Limine motion (4)	Motion in Limine	250	1000	
E. Douglas	5/11/21	3	3	Reviewing comments from team, integrating into final document (3)	Settlement Agreement	250	750	
E. Douglas	5/11/21	3	3	Drafting response to Motion in Limine motion, combining other parts of Motion in Limine motion together and creating one comprehensive document. (3)	Motion in Limine	250	750	
E. Douglas	5/12/21	3	3	Deposition review upchurch (3)	Deposition	250	750	
E. Douglas	5/13/21	1	1	Weekly meeting (1)	Case Management - Team Meeting	250	250	
E. Douglas	5/13/21	0.5	0.5	PC w/ mel re: drafting response to Motion in Limine (.5)	Motion in Limine	250	125	
E. Douglas	5/14/21	4.5	4.5	Editing reply to Motion in Limine motion	Motion in Limine	250	1125	
E. Douglas	5/18/21	0.5	0.5	Meeting w/ Melanie re: plans for travel and plans for speaking with plaintiffs between meet and confer and mediation (.5)	Mediation	250	125	
E. Douglas	5/21/21	1	1	Prep meeting with JT for phone calls with Clients (1)	Client Communications	250	250	
E. Douglas	5/21/21	1	1	Video call with Ronald Brooks via zoom at EHCC for the purposes of discussing settlement agreement (1)	Settlement Agreement	250	250	
E. Douglas	5/21/21	1	1	PC w/ Bruce Charles (1)	Client Communications	250	250	
E. Douglas	5/24/21	1	1	PC with LJ re: settlement agreement	Settlement Agreement	250	250	
E. Douglas	5/24/21	5	5	Travel to Monroe for settlement agreement	Travel	250	1250	
E. Douglas	5/25/21	8.5	8.5	Mediated settlement discussions in Monroe	Settlement Agreement	250	2125	
E. Douglas	5/26/21	8	8	Mediated settlement discussions in Monroe and travel back from Monroe	Block Billing	250	2000	
E. Douglas	5/27/21	0.5	0.5	Weekly meeting (.5)	Case Management - Team Meeting	250	125	
E. Douglas	5/27/21	1	1	Starting to draft skeleton of fact proof chart (1)	Trial Preparation	250	250	
E. Douglas	6/1/21	3	3	Working on MSJ - research on 8th A claims (3)	Motion for Summary Judgement	250	750	
E. Douglas	6/2/21	2	2	Editing reply to class cert brief (2)	Class Certification	250	500	
E. Douglas	6/7/21	5	5	Research for drafting MSJ	Motion for Summary Judgement	250	1250	
E. Douglas	6/8/21	3.5	3.5	Reviewing depositions, working on drafting MSJ (3.5)	Motion for Summary Judgement	250	875	
E. Douglas	6/8/21	0.5	0.5	Responding to team emails about the case (.5)	Case Management	250	125	
E. Douglas	6/9/21	1	1	Calendaring upcoming deadlines / creating agenda for tomorrow's meeting / reviewing settlement agreement one more time, emailing back to the team (1)	Settlement Agreement	250	250	
E. Douglas	6/9/21	1	1	/ Video conference with L. J (1) / Drafting memo re: video conferences	Case Management	250	250	
E. Douglas	6/10/21	6	6	Working on draft of MSJ (6)	Motion for Summary Judgement	250	1500	
E. Douglas	6/11/21	2	2	Drafting MSJ (2)	Motion for Summary Judgement	250	500	
E. Douglas	6/30/21	5	5	Editing Reply to MSJ	Motion for Summary Judgement	250	1250	
E. Douglas	7/1/21	6	6	Working on 8th A MSJ response (6)	Motion for Summary Judgement - Eighth Amendment	250	1500	
E. Douglas	7/2/21	6	6	Editing reply to MSJ for 8th Amendment portion	Motion for Summary Judgement - Eighth Amendment	250	1500	
E. Douglas	7/5/21	5.5	5.5	Work on ADA reply MSJ - (2) Working on 8th A Reply MSJ (3.5)	Motion for Summary Judgement - ADA & RA	250	1375	
E. Douglas	7/6/21	4.6	4	Conversation with Brittney Grimes (intern) re: Daubert hearing research (6) - Editing law sections of the 8th A Reply MSJ (4)	Motion for Summary Judgement - Eighth Amendment	250	1000	
E. Douglas	7/7/21	5	5	Working on MSJ - pulling facts and editing the 8th A section (5)	Motion for Summary Judgement - Eighth Amendment	250	1250	
E. Douglas	7/8/21	0.5	0.5	Weekly meeting (.5)	Case Management - Team Meeting	250	125	
E. Douglas	7/8/21	5	5	Working on MSJ for 8th A (5)	Motion for Summary Judgement - Eighth Amendment	250	1250	
E. Douglas	7/8/21	0.5	0.5	Video Chat with Leah re: continuous confinement assignment (.5)	Case Management	250	125	
E. Douglas	7/9/21	2	2	Working on MSJ for 8th A	Motion for Summary Judgement - Eighth Amendment	250	500	
E. Douglas	7/12/21	9	9	Working on MSJ reply	Motion for Summary Judgement	250	2250	
E. Douglas	7/15/21	0.5	0.5	Filing witness list for Motion in Limine Hearing (.5)	Motion in Limine	250	125	
E. Douglas	7/22/21	0.5	0.5	Meeting regarding Judge Foote's minute entry (.5)	Case Management	250	125	
E. Douglas	7/23/21	2	2	Prep for Motion in Limine hearing meeting (2)	Motion in Limine	250	500	
E. Douglas	7/23/21	5	5	Editing and drafting Surreply to MSJ (5)	Motion for Summary Judgement	250	1250	
E. Douglas	7/27/21	2	2	Phone call with KP and drafting memo for the team (2)	Client Communications	250	500	
E. Douglas	7/27/21	4.5	4.5	Editing MSJ reply (4.5)	Motion for Summary Judgement	250	1125	
E. Douglas	7/29/21	1	1	Weekly Meeting	Case Management - Team Meeting	250	250	
E. Douglas	8/3/21	1	1	PC with client wife (1)	Client Communications - Relative	250	250	
E. Douglas	8/4/21	2	2	Document review (2)	DWCC Doc Review	250	500	
E. Douglas	8/5/21	5.5	5.5	Weekly meeting (2) Call with KP (1) Drafting memo re: same (1) Email correspondence clearing up questions from call with KP (2) Document review (2.3)	Time Entry Issue	250	1375	
E. Douglas	8/6/21	2	2	Document review (2)	DWCC Doc Review	250	500	
E. Douglas	8/10/21	0.5	0.5	Worked on cleaning up notes and spreadsheet from meeting yesterday - sent around to team (.5)	Case Matters	250	125	
E. Douglas	8/10/21	1	1	Went through the defendant's request to open discovery (1)	Motion to Reopen Discovery	250	250	
E. Douglas	8/11/21	1	1	Meeting re: the defendant's motion to reopen discovery (1)	Motion to Reopen Discovery	250	250	
E. Douglas	8/12/21	0.5	0.5	Weekly meeting (.5)	Case Management - Team Meeting	250	125	
E. Douglas	8/14/21	6.5	6.5	Preparing for status conference on Monday re: re-opening discovery beginning draft of motion in opposition. Meeting with the team re: status conference.	Status Conference	250	1625	
E. Douglas	8/19/21	2	2	Weekly Meeting (2)	Case Management - Team Meeting	250	500	
E. Douglas	8/19/21	8	8	Working on response to D's motion to re-open (8)	Motion to Reopen Discovery	250	2000	
E. Douglas	8/20/21	4	4	Working on response to D's motion to re-Open	Motion to Reopen Discovery	250	1000	
E. Douglas	8/25/21	1	1	Preparation for status conference (1)	Status Conference	250	250	
E. Douglas	8/26/21	2	2	Weekly meeting and conversation about witness (2)	Case Management - Team Meeting	250	500	
E. Douglas	9/1/21	5.5	5.5	Calls with clients at DWCC	Client Communications	250	1375	
E. Douglas	9/8/21	1	1	Call with LJ at Hunt and Follow up meeting with Melanie	Block Billing	250	250	
E. Douglas	9/9/21	2	2	weekly meeting (2)	Case Management - Team Meeting	250	500	
E. Douglas	9/10/21	0.5	0.5	call with RB(.5)	Case Management	250	125	
E. Douglas	9/10/21	0.5	0.5	Working on call memo (.5)	Call Memo	250	125	
E. Douglas	9/21/21	0.5	0.5	Status conference (.5)	Status Conference	250	125	
E. Douglas	9/27/21	3.5	3.5	Working on first disco request for the remedy phase with Melanie	Discovery	250	875	
E. Douglas	9/29/21	4.5	4.5	Reviewing client depositions	Deposition	250	1125	
E. Douglas	10/1/21	3.5	3.5	Finishing depo review and beginning to enter names into the trial evidence spreadsheet (3.5)	Deposition	250	875	
E. Douglas	10/6/21	0.5	0.5	Communicating with Mel and jon about the contract and about the drafting schedule for the appeal (.5)	Case Management - Work Plan	250	125	
E. Douglas	10/7/21	2	2	Drafting call memos from calls today (2)	Call Memo	250	500	
E. Douglas	10/8/21	0.5	0.5	Filling out application for the 5th Cir (.5)	Appeal of Class Certification	250	125	
E. Douglas	10/8/21	7	7	Creating witness list for trial - going over exhibits that we would like to include infor expert testimony (7)	Trial Preparation	250	1750	
E. Douglas	10/11/21	3	3	Trial prep convo w/ mel (3)	Trial Preparation	250	750	
E. Douglas	10/13/21	2	2	Planning meeting with Melanie	Case Management - Planning	250	500	
E. Douglas	10/18/21	2	2	Working on pre-trial order (2)	Pre-Trial Orders	250	500	
E. Douglas	10/18/21	1	1	Meeting with PJI and Melanie (1)	Case Management	250	250	
E. Douglas	10/19/21	3.5	3.5	Going through evidence to find other documents that might pertain to the 1st A claims and passing along that informaition to the Tulane students. (3.5)	Case Management	250	875	
E. Douglas	10/21/21	5.5	5.5	Drafting Pre Trial order (5.5)	Pre-Trial Orders	250	1375	

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
E. Douglas	10/24/21	1.5	5.5	Discussion re: which exhibits to pull for deliberate indifference line of proof (1.5)	Trial Exhibits	250	1375
E. Douglas	10/24/21	4	4	Pulling exhibits UORs (4)	Trial Exhibits	250	1000
E. Douglas	10/25/21	7	7	Going through evidence and pulling exhibits (7)	Trial Exhibits	250	1750
E. Douglas	10/26/21	5	5	Pulling exhibits (5)	Trial Exhibits	250	1250
E. Douglas	10/26/21	4	4	Meeting finalize exhibits (4)	Trial Exhibits	250	1000
E. Douglas	10/27/21	8	8	Working on pulling exhibits. Drafting PTO	Pre-Trial Orders	250	2000
E. Douglas	10/30/21	6	6	Finalizing PTO - sending to team for edits	Joint Pre Trial Conference (JPTO)	250	1500
E. Douglas	11/3/21	3	3	Communicating with PJI re: finding clients in custody, communicating re: the schedule for preparing witnessess and taking depositions for incarcerated clients. Set up Slack for communication around immediate questions between the DRLA team and the PJI teams.	Client Communications	250	750
E. Douglas	11/5/21	0.5	0.5	Finalized notes from weekly meeting (.5)	Case Management	250	125
E. Douglas	11/5/21	0.5	0.5	Conversation with Nishi about possible intern help and follow up email (.5)	Staffing Matters	250	125
E. Douglas	11/9/21	3	3	Printing and reviewing the JPTO (3)	Joint Pre Trial Conference (JPTO)	250	750
E. Douglas	11/10/21	7	7	Phone calls to clients (7)	Client Communications	250	1750
E. Douglas	11/10/21	2	2	Meeting with Mel and Jon re: getting ready for tomorrow (2)	Call/Discussion - Co-Counsel	250	500
E. Douglas	11/11/21	1	1	Weekly meeting (1)	Case Management - Team Meeting	250	250
E. Douglas	11/11/21	3	3	Meet and Confer with D's and debrief (3)	Meet and Confer	250	750
E. Douglas	11/12/21	1	1	Coordinating visits to Hunt and DWCC with the PJI team. Emailed Chayla at Hunt to begin to set that up. Communicated with PJI regarding changes to the visitation format. (1)	DWCC Visits - Preparation	250	250
E. Douglas	11/15/21	0.5	0.5	Reviewing evidence list sent by melanie (.5)	Case Management	250	125
E. Douglas	11/15/21	1	1	Working on drafting direct and cross questions - (1)	Trial Preparation	250	250
E. Douglas	11/16/21	6	6	Editing Motion in Limine including splitting the motion into 3 motions and doing additional research to support the propositions.	Motion in Limine	250	1500
E. Douglas	11/17/21	5	5	Drafting evidentiary objections to Defendants' list of exhibits (5)	Trial Exhibits	250	1250
E. Douglas	11/18/21	1.7	6	Status conference with Judge Foote re: discovery issues (1.7)	Status Conference - Judge Foote	250	1500
E. Douglas	11/18/21	0.5	0.5	Emailed OC re JPTO and clients that we want to depose instead of take live testimony from. (.5)	Deposition	250	125
E. Douglas	11/21/21	3	3	Culling exhibits and doing document review	Case Management	250	750
E. Douglas	11/22/21	0.5	0.5	PC w/ Sammy from PJI re: LJ visit and his unwillingness to testify (.5)	Client Communications	250	125
E. Douglas	11/22/21	0.5	0.5	Coordinating visits at Hunt (.5)	EHCC Visits	250	125
E. Douglas	11/23/21	1	1	Conversation with Jon about tier logs - sending Jon a list of the UOR's that have MH concerns involved so he can cross reference for tier logs (1)	Unusual Occurrence Report	250	250
E. Douglas	11/23/21	2	2	Looking through body cam video to determine if anything can be left off of the exhibit list (2)	Trial Exhibits	250	500
E. Douglas	11/24/21	3	3	Review of the UOR's	Unusual Occurrence Report	250	750
E. Douglas	11/29/21	2	2	transferring UOR document review into the doc review before trial spreadsheet (2)	Unusual Occurrence Report	250	500
E. Douglas	11/30/21	0.5	0.5	Organizing to do list and task outs for the upcoming meeting with melanie (.5)	Case Management	250	125
E. Douglas	11/30/21	0.5	0.5	Mailing outreach letter to DB (.5)	Outreach Letter	250	125
E. Douglas	11/30/21	1	1	Emails with team re: exhibits and JPTO (1)	Trial Exhibits	250	250
E. Douglas	11/30/21	1	1	Meeting with Melanie about exhibits (1)	Trial Exhibits	250	250
E. Douglas	11/30/21	2	2	Labeling exhibits (2)	Trial Exhibits	250	500
E. Douglas	12/1/21	0.5	0.5	Final edits on the JPTO (.5)	Joint Pre Trial Conference (JPTO)	250	125
E. Douglas	12/1/21	1	1	Creating Excel spreadsheet for document review of Defendants exhibits (1)	Trial Preparation	250	250
E. Douglas	12/3/21	4	4	Reviewing D's responses to MIL - editing P's response to the spoliation motion (4)	Motion for Spoliation	250	1000
E. Douglas	12/6/21	2	2	Writing FFCL (2)	FFCL	250	500
E. Douglas	12/7/21	3	3	Meeting with Adams and Reese at their office to go over the logistics of trial. (3)	Trial Preparation	250	750
E. Douglas	12/7/21	3	3	Working on FFCL (3)	FFCL	250	750
E. Douglas	12/8/21	3.5	3.5	Working on FFCL (3.5)	FFCL	250	875
E. Douglas	12/8/21	4	4	Drafting FFCL (4)	FFCL	250	1000
E. Douglas	12/9/21	4	4	Drafting FFCL (4)	FFCL	250	1000
E. Douglas	12/10/21	11.5	11.5	Drafting FFCL	FFCL	250	2875
E. Douglas	12/12/21	10	10	Drafting FFCL	FFCL	250	2500
E. Douglas	12/14/21	1	1	Conversation with KS re: trial planning (1)	Trial Preparation	250	250
E. Douglas	12/14/21	1	1	Doc review (1)	DWCC Doc Review	250	250
E. Douglas	12/16/21	1	1	DWCC meeting (1)	Case Management	250	250
E. Douglas	12/16/21	4	4	PreTrial Conference (4)	Trial Preparation	250	1000
E. Douglas	12/16/21	2	2	Debrief from Pretrial meeting (2)	Trial Preparation	250	500
E. Douglas	12/16/21	2	2	DWCC meeting (2)	Case Management	250	500
E. Douglas	12/17/21	3	3	Working on Drafting lines of questioning	Trial Preparation	250	750
E. Douglas	12/19/21	10	10	Working on drafting lines of questioning for witnesses at trial and the pretrial FFCL (10)	FFCL	250	2500
E. Douglas	12/20/21	5	5	Drafting Pretrial FFCL (5)	FFCL	250	1250
E. Douglas	12/20/21	3	3	Drafting testimony questions for Sec. Leblanc (3)	Trial Preparation	250	750
E. Douglas	12/21/21	0.5	0.5	Responding to team and talking about D counsel speaking to our clients - (.5)	Trial Preparation	250	125
E. Douglas	12/21/21	6	6	Drafting questions for trial (6)	Trial Preparation	250	1500
E. Douglas	12/22/21	2	2	Reviewing the redaction of Demarcus thomas' deposition (2)	Deposition	250	500
E. Douglas	12/22/21	4	4	Drafting questions for trial (4)	Trial Preparation	250	1000
E. Douglas	12/23/21	7.5	7.5	Incorporating edits from other team members into the redaction of deposition - and sending to Defendants (1.5) Drafting questions for trial	Time Entry Issue	250	1875
E. Douglas	12/24/21	5	5	Incorporating edits from other team members into the redaction of deposition - and sending to Defendants (1.5) Drafting questions for trial	Time Entry Issue	250	1250
E. Douglas	12/25/21	7.5	7.5	Drafting questions for trial	Trial Preparation	250	1875
E. Douglas	12/27/21	4	4	Preparing Dan Pacholke to testify (2) Working on questions for Dan (1.5) Emailing D's re: redacted depositions (.5) Redacting RB's Deposition	Time Entry Issue	250	1000
E. Douglas	12/28/21	9	9	Drafting witness questions - doing doc review	Working with Witnesses	250	2250
E. Douglas	12/29/21	7	7	Drafting witness questions - doing doc review	Working with Witnesses	250	1750
E. Douglas	12/30/21	1	1	Weekly meeting (1)	Case Management - Team Meeting	250	250
E. Douglas	12/30/21	0.5	0.5	Meeting w/ OC re: redaction of depositions -.5)	Deposition	250	125
E. Douglas	12/30/21	2	2	Redacting depositions for use at trial (2)	Trial Preparation	250	500
E. Douglas	12/31/21	6	6	Document review - Drafting questions for direct and cross	Trial Preparation	250	1500
E. Douglas	1/1/22	10	10	Document review - Drafting questions for direct and cross	Trial Preparation	250	2500
E. Douglas	1/2/22	6	6	Document review - Drafting questions for direct and cross	Trial Preparation	250	1500
E. Douglas	1/3/22	4	4	Preparing for trial - Drafting lines of questioning (4)	Trial Preparation	250	1000
E. Douglas	1/3/22	1	1	Reviewing D's final will call list - (1)	Trial Preparation	250	250
E. Douglas	1/4/22	3	3	Preparing for trial - drafting lines of questioning (3)-	Trial Preparation	250	750

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
E. Douglas	1/4/22	1	1	Meeting with team re: order of witnesses (1)	Trial Preparation	250	250
E. Douglas	1/4/22	3	3	Drafting lines of questioning and reviewing evidence (3)	Trial Preparation	250	750
E. Douglas	1/5/22	5	5	Drafting lines of questioning and reviewing evidence (5)	Trial Preparation	250	1250
E. Douglas	1/5/22	0.5	0.5	Emailing with interns (.5)	Staffing Matters	250	125
E. Douglas	1/5/22	2	2	Organizing evidence for trial (2)	Trial Preparation	250	500
E. Douglas	1/6/22	2	2	DWCC meeting (2)	Case Management	250	500
E. Douglas	1/6/22	2	2	Document review (2)	Trial Preparation	250	500
E. Douglas	1/7/22	6	6	Reviewing questions - drafting questions - reviewing documents (6)	Trial Preparation	250	1500
E. Douglas	1/8/22	2	2	Working on security staff questions - (2)	Trial Preparation	250	500
E. Douglas	1/9/22	4	4	Working on logistics for trial - organizing interns - organizing documents - preparing to go to trial tomorrow (4)	Trial Preparation	250	1000
E. Douglas	1/15/22	13	13	Drafting direct and cross questions preparing for the next week of trial. Organizing evidence, getting exhibits ready	Trial Preparation	250	3250
E. Douglas	2/7/22	0.5	0.5	Meeting with the judge re: FFCL (.5)	FFCL	250	125
E. Douglas	2/8/22	3	3	Reviewing trial transcripts for FFCL	FFCL	250	750
E. Douglas	2/14/22	3	3	Reviewing trial transcripts for FFCL	FFCL	250	750
E. Douglas	2/15/22	4	4	Reviewing trial transcripts for FFCL	FFCL	250	1000
E. Douglas	2/17/22	1	1	Weekly meeting (1)	Case Management - Team Meeting	250	250
E. Douglas	2/17/22	5	5	FFCL reviewing transcripts (5)	FFCL	250	1250
E. Douglas	2/21/22	5	5	Review of transcripts for FFCL (5)	FFCL	250	1250
E. Douglas	2/22/22	6	6	Working on the draft of the FFCL - merging different drafts / comparing the pre trial draft to the post trial draft	FFCL	250	1500
E. Douglas	2/23/22	4	4	Working on the FFCL (4)	FFCL	250	1000
E. Douglas	2/26/22	6	6	Working on the FFCL - incorporating information from the spreadsheet into the Draft (6)	FFCL	250	1500
E. Douglas	2/27/22	4.5	4.5	Drafting FFCL	FFCL	250	1125
E. Douglas	2/28/22	4	4	Working on FFCL (4)	FFCL	250	1000
E. Douglas	3/2/22	1	1	Drafting motion for extension of time, sending to team for edits, filing into court. (1)	Motion for Extension	250	250
E. Douglas	3/2/22	3	3	Worked on FFCL (3)	FFCL	250	750
E. Douglas	3/4/22	4.5	4.5	Working on a reviewing transcripts for FFCL (4.5)	FFCL	250	1125
E. Douglas	3/6/22	5	5	Working on the FFCL	FFCL	250	1250
E. Douglas	3/7/22	6	6	Drafting the FFCL	FFCL	250	1500
E. Douglas	3/8/22	10	10	Drafting FFCL	FFCL	250	2500
E. Douglas	3/10/22	8	8	Drafting FFCL (8)	FFCL	250	2000
E. Douglas	3/10/22	0.5	0.5	Weekly Meeting (.5)	Case Management - Team Meeting	250	125
E. Douglas	3/13/22	14.5	14.5	Drafting FFCL	FFCL	250	3625
E. Douglas	3/14/22	13.5	13.5	Drafting FFCL	FFCL	250	3375
E. Douglas	3/31/22	2	2	Weekly meeting	Case Management - Team Meeting	250	500
E. Douglas	4/12/22	1	1	Phone conversation with Nishi Kumar regarding fees affidavits for the PJI team. Discussed best way to gather the documents from other attorneys and agreed that the PJI team will try to submit the affidavits by 4/25.	Affidavits	250	250
E. Douglas	4/14/22	0.5	0.5	Weekly meeting	Case Management - Team Meeting	250	125
Sarah Hall (Voigt)	8/24/17	3.5	3.5	Review records of potential named plaintiffs/class members, preparation for upcoming visit to David Wade.	Client Intake	400	1400
Sarah Hall (Voigt)	8/25/17	7	7	Continue review of records of potential named plaintiffs/class members in preparation for upcoming visit to David Wade.	Client Intake	400	2800
Sarah Hall (Voigt)	8/27/17	6.5	6.5	Travel to New Orleans office, travel with co-counsel to Minden/Homer for visit with David Wade inmates.	DWCC Visits - Travel	400	2600
Sarah Hall (Voigt)	8/28/17	9	9	Travel from Minden to David Wade prison (Homer), visit with inmates on tiers, individual meetings, travel to hotel in Minden.	DWCC Visits	400	3600
Sarah Hall (Voigt)	8/29/17	15	15	Travel from Minden to David Wade prison, individual meetings, travel to New Orleans.	DWCC Visits	400	6000
Sarah Hall (Voigt)	10/11/17	0.5	0.5	Meeting with AC co-counsel, discussion of demand letter to DOC re violation of spoliation letter.	Evidence Spoliation	400	200
Sarah Hall (Voigt)	10/12/17	5	5	Review notes, work on drafts memos re tier visits interviews.	DWCC Visit Memos	400	2000
Sarah Hall (Voigt)	10/23/17	8.5	8.5	Travel to Hunt CC visits with potential plaintiffs, witnesses who had been moved to Hunt from David Wade. Travel to New Orleans	EHCC Visits	400	3400
Sarah Hall (Voigt)	11/8/17	1	1	Weekly team litigation team meeting	Case Management - Team Meeting	400	400
Sarah Hall (Voigt)	11/9/17	0.5	0.5	Edit draft spoliation letter, email same to litigation team	Evidence Spoliation	400	200
Sarah Hall (Voigt)	11/13/17	1	1	Draft Co-Counsel Agreement with McArthur Justice Center, email same to litigation team	Case Management - Professional Services Agreement	400	400
Sarah Hall (Voigt)	11/19/17	4.5	4.5	Review and revise draft TRO memo and Draft Complaint, email same to co-counsel	TRO	400	1800
Sarah Hall (Voigt)	11/28/17	1	1	Review client interview Memos from 11/17/17 DWCC visit and Memos and letters generated from correspondence in preparation for weekly meeting on 11/29/17.	DWCC Visit Memos	400	400
Sarah Hall (Voigt)	12/20/17	5	5	Review and edit draft Complaint. Email same to Co-Counsel	Complaint	400	2000
Sarah Hall (Voigt)	1/12/18	0.5	0.5	Discussions and review of edits to Draft Complaint with co-counsel Jonathan Trunell	Complaint	400	200
Sarah Hall (Voigt)	2/9/18	0.5	0.5	TC W/ COUNSEL, DISCUSS COMPLAINT AND FINAL EDITS	Complaint	400	200
Sarah Hall (Voigt)	2/16/18	1	1	TC w co-counsel re Class Counsel Declaration, Draft Class Counsel Declaration, email same to co-counsel.	Class Certification	400	400
Sarah Hall (Voigt)	2/19/18	3.5	3.5	Final review/edits of Draft Complaint, meeting with co-counsel to discuss same and next steps.	Complaint	400	1400
Sarah Hall (Voigt)	2/20/18	1	1	Meetings w co-counsel re filing Complaint, Class Cert and TRO	Complaint	400	400
Sarah Hall (Voigt)	2/23/18	4	4	Meetings w co-counsel, review TRO, prepare questions for moot argument, conduct moot argument moot lead counsel.	TRO Moot	400	1600
Sarah Hall (Voigt)	2/27/18	0.5	0.5	Attend Status Conference with Judge Dick	Status Conference	400	200
Sarah Hall (Voigt)	3/1/18	2	2	Review research on 1983 actions, Review Madrid v. Gomez	Legal Research	400	800
Sarah Hall (Voigt)	3/5/18	0.5	0.5	Review/edit Draft Memo in Reply to TRO Opposition, email same to co-counsel.	TRO	400	200
Sarah Hall (Voigt)	3/6/18	0.5	0.5	Meeting w co-counsel, Discussion of call with potential witness	Call/Discussion - Co-Counsel	400	200
Sarah Hall (Voigt)	3/7/18	2	2	Attend weekly litigation team meeting, review letters from inmates and responses. Discuss case strategy.	Case Management - Team Meeting	400	800
Sarah Hall (Voigt)	3/15/18	8.5	8.5	Travel to Minden for meeting with clients at DWCC.	DWCC Visits - Travel	400	3400
Sarah Hall (Voigt)	3/16/18	6.5	6.5	Conduct client interviews at DWCC.	DWCC Visits	400	2600
Sarah Hall (Voigt)	3/28/18	1	1	Attend weekly litigation team meetings	Case Management - Team Meeting	400	400
Sarah Hall (Voigt)	3/29/18	0.5	0.5	Review/revise Opp. Mt to Strike, email same to Melaine Bray	Motion to Strike Affidavits	400	200
Sarah Hall (Voigt)	4/4/18	0.5	0.5	Review/revise Supplemental Response to Opposition to TRO	TRO	400	200
Sarah Hall (Voigt)	4/10/18	1	1	Meeting with litigation team re Rule 26 Conference	Discovery	400	400
Sarah Hall (Voigt)	5/4/18	0.5	0.5	Meeting with co-counsel re video confidentiality.	Evidentiary Issues - Security Camera Videos	400	200
Sarah Hall (Voigt)	5/9/18	1	1	Attend DWCC Status Conference, meeting following status conf with co-counsel to discuss same.	Status Conference	400	400
Sarah Hall (Voigt)	5/14/18	1	1	Meeting with co-counsel MB, JT re Camp J closure and possible PRA.	Public Record Requests	400	400
Sarah Hall (Voigt)	5/30/18	0.5	0.5	Meeting with litigation team prior to (.5)	Case Management - Team Meeting	400	200
Sarah Hall (Voigt)	5/30/18	0.5	0.5	and following conference (.5) with Magistrate Judge to discuss same.	Status Conference - Debrief	400	200

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Sarah Hall (Voigt)	5/30/18	0.5	0.5	Status conference with Magistrate Judge.	Status Conference	400	200
Sarah Hall (Voigt)	6/21/18	1	1	Attend weekly DWCC litigation team meeting.	Case Management - Team Meeting	400	400
Sarah Hall (Voigt)	6/21/18	3.5	3.5	Prep for PI Hearing	Preliminary Injunction	400	1400
Sarah Hall (Voigt)	6/22/18	4	4	Continue prep for PI, and revise direct examination questions, examinations	Preliminary Injunction	400	1600
				conduct moots with litigation team.			
Sarah Hall (Voigt)	6/25/18	6.5	6.5	Travel to Minden.	DWCC Visits - Travel	400	2600
Sarah Hall (Voigt)	6/27/18	11	11	Preparation for witness interviews and for PI Hearing	Preliminary Injunction	400	4400
Sarah Hall (Voigt)	6/27/18	11.5	11.5	Continue prep for PI Hearing	Preliminary Injunction	400	4600
Sarah Hall (Voigt)	6/28/18	5	5	Represented plaintiffs at PI Hearing.	Preliminary Injunction Hearing	400	2000
Sarah Hall (Voigt)	6/28/18	6.5	6.5	Travel home from Shreveport to New Orleans	Preliminary Injunction Hearing - Travel	400	2600
Sarah Hall (Voigt)	7/13/18	2	2	Attend weekly litigation team meeting, review prisoners letters.	Case Management - Team Meeting	400	800
Sarah Hall (Voigt)	7/19/18	1	1	Attend weekly litigation team meeting, review prisoner letters.	Case Management - Team Meeting	400	400
Sarah Hall (Voigt)	7/23/18	2	2	Litigation team meeting re Discovery responses	Discovery	400	800
Sarah Hall (Voigt)	8/1/18	4	4	Litigation team meeting re case strategy for class cert hearing.	Class Certification	400	1600
Sarah Hall (Voigt)	8/14/18	0.5	0.5	Meeting w/co-counsel MB re update on case	Call/Discussion - Co-Counsel	400	200
Sarah Hall (Voigt)	8/20/18	0.5	0.5	Draft Motion and Order for Protective Order re Expert visits and confidential communication with prisoners during tier walk-throughs.	Motion for Protective Order	400	200
Sarah Hall (Voigt)	8/23/18	1	1	Attend weekly litigation team meeting.	Case Management - Team Meeting	400	400
Sarah Hall (Voigt)	8/27/18	3.5	3.5	Begin research for Memo Objecting to Magistrate's Report and Recommendation re PI Hearing decision.	Objection to Report & Recommendations	400	1400
Sarah Hall (Voigt)	8/30/18	3	3	Continue research/writing of Objection to Magistrate's Report and Recommendation.	Objection to Report & Recommendations	400	1200
Sarah Hall (Voigt)	8/31/18	3.5	3.5	Continue work on Draft Memo re Objection to Magistrate's Report and Recommendation	Objection to Report & Recommendations	400	1400
Sarah Hall (Voigt)	9/6/18	2	2	BEGIN RESEARCH FOR DRAFT OF MOTION TO ENFORCE SETTLEMENT AGREEMENT.	Motion to Enforce Settlement Agreement	400	800
Sarah Hall (Voigt)	9/6/18	4.5	4.5	BEGIN RESEARCH FOR MOTION TO ENFORCE SETTLEMENT AGREEMENT	Motion to Enforce Settlement Agreement	400	1800
Sarah Hall (Voigt)	9/7/18	0.5	0.5	Rev discovery re pill calls w co-counsel, JT and MB	Case Matters	400	200
Sarah Hall (Voigt)	9/10/18	0.5	0.5	Conference w co-counsel RL, MB re status of case.	Call/Discussion - Co-counsel	400	200
Sarah Hall (Voigt)	9/11/18	0.5	0.5	Conference w co-counsel, MB re venue for enforcement action.	Call/Discussion - Co-counsel	400	200
Sarah Hall (Voigt)	9/13/18	2	2	Attend weekly litigation team meeting.	Case Management - Team Meeting	400	800
Sarah Hall (Voigt)	9/20/18	1	1	Attend weekly litigation team meeting.	Case Management - Team Meeting	400	400
Sarah Hall (Voigt)	9/21/18	0.5	0.5	Conf w co-counsel, MB, JT re LA forensics issues	Preliminary Injunction Hearing	400	200
Sarah Hall (Voigt)	9/28/18	2	2	Continue research re Objection to Magistrate's, Report and Recommendation	Objection to Report & Recommendations	400	800
Sarah Hall (Voigt)	10/11/18	7.5	7.5	Travel to Baton Rouge attend Angola trial, travel to New Orleans	Attend Angola Trial	400	3000
Sarah Hall (Voigt)	10/26/18	0.5	0.5	Review/edit Draft Motion in Opp to Defendants' Motion to Compel	Motion to Compel	400	200
Sarah Hall (Voigt)	10/26/18	2	2	Attend weekly litigation meeting, off conf w co-counsel KS following same	Case Management - Team Meeting	400	800
Sarah Hall (Voigt)	10/29/18	7	7	DWCC litigation team meeting with Ed Arno, discussed ADX case and case strategy in Tellis v. LeBlanc.	Case Management - Team Meeting	400	2800
Sarah Hall (Voigt)	11/16/18	0.5	0.5	Attend Scheduling Conference	Status Conference	400	200
Sarah Hall (Voigt)	12/17/18	0.5	0.5	REVIEW REQUEST TO SUPPLEMENT DISCOVERY, REVIEW 6TH RFP, OFF CONF W CO-COUNSEL MB RE SAME	Discovery	400	200
Sarah Hall (Voigt)	1/10/19	0.5	0.5	Review, edit Reply to Opposition to Motion to Compel, off conf w co-counsel re same.	Motion to Compel	400	200
R. Lospennato	5/9/17	1	1	Meeting with Jon, Derrick and Chelsea for Kathryn to provide update on investigation.	Case Management - Team Meeting	400	400
R. Lospennato	5/9/17	1	1	Start scanning and reviewing documents	Case Management - Document Management	400	400
R. Lospennato	5/19/17	1	1	Meeting with Mr. Trunnell regarding next steps in DWCC case	Case Management - Planning	400	400
R. Lospennato	7/24/17	0.5	0.5	Review and approve litigation budget	Case Management	400	200
R. Lospennato	7/26/17	3	3	Travel to Baton Rouge attend Angola trial, travel to New Orleans	Attend Angola Trial	400	1200
R. Lospennato	7/26/17	3	3	Fed Ct Status Conference; meet with Defendants.	Status Conference	400	1200
R. Lospennato	8/2/17	1	1	M/w Jon, Sarah, Chelsea and Yvonne to discuss allocation of support staff work and what needs to be done on case.	Case Management - Staffing	400	400
R. Lospennato	8/7/17	1	1	Review redraft of settlement agreement and discuss with Jon	Settlement Agreement	400	400
R. Lospennato	8/14/17	0.5	0.5	M/w Kim, Jon, Sarah and Chelsea re staffing for case.	Case Management - Staffing	400	200
R. Lospennato	9/11/17	0.5	0.5	M/w with Jon, Sarah and Melanie to map strategy	Case Management	400	200
R. Lospennato	10/3/17	0.5	0.5	Updated case notes on separate case file, discuss notes with Chelsea, and consolidated case with David Wade Investigation	Investigation	400	200
R. Lospennato	10/10/17	0.5	0.5	Legal Research	Legal Research	400	200
R. Lospennato	11/9/17	0.5	0.5	T/c to discuss TRO/research on preservation issues.	TRO	400	200
R. Lospennato	11/29/17	2	2	M/w co-counsel and DWCC team	Case Management - Team Meeting	400	800
R. Lospennato	1/11/18	3.5	3.5	Review and edit complaint (pm)	Complaint	400	1400
R. Lospennato	1/14/18	4	4	Reviewing 38 client files in database and assigning to Jon and Chelsea, consolidating with DWCC project	Complaint	400	1600
R. Lospennato	2/22/18	1	1	Moot court Jon regarding TRO motion of preservation of evidence issues	TRO Moot	400	400
R. Lospennato	3/2/18	1	1	Review Defendant's motion for leave to file and opposition to TRO	Motion for Leave to File	400	400
R. Lospennato	3/6/18	0.5	0.5	Review revised draft sur-reply on TRO preservation issue; meet with Jon and Sarah again to discuss	TRO	400	200
R. Lospennato	3/9/18	0.5	0.5	Review Jon's proposal on experts	Case Management - Experts	400	200
R. Lospennato	4/3/18	0.5	0.5	Discuss memo to experts re work on case with Jon.	Working with Experts	400	200
R. Lospennato	4/5/18	0.5	0.5	Review and calendar scheduling order and other relevant dates; discuss with Sarah.	Scheduling Order	400	200
R. Lospennato	4/13/18	1	1	Draft timelines for status report. Discuss with Jon	Case Management	400	400
R. Lospennato	4/30/18	1	1	Review and edit TRO motion (now PI motion). Discuss with Jon.	TRO	400	400
R. Lospennato	4/30/18	0.5	0.5	Review filings on PI and motion to file conventionally.	Preliminary Injunction	400	200
R. Lospennato	5/15/18	0.5	0.5	Review Opposition to Motion to Strike and discuss changes with Melanie and Sarah.	Motion to Strike Affidavits	400	200
R. Lospennato	5/15/18	0.5	0.5	Discuss settlement agreement drafting with team.	Settlement Agreement	400	200
R. Lospennato	6/12/18	1	1	Mtg re upcoming status conference.	Status Conference	400	400
R. Lospennato	6/18/18	0.5	0.5	Review memo and order on Habeas Petition. Organize file.	Writ of Habeas Corpus	400	200
R. Lospennato	6/27/18	5.5	5.5	Drive to Shreveport for trial prep and hearing on PI	Preliminary Injunction	400	2200
R. Lospennato	6/28/18	3	3	Drive to Lafayette from Shreveport after trial on PI motion.	Preliminary Injunction Hearing	400	1200
R. Lospennato	6/28/18	2	2	Trial on PI motion in WD LA (am)	Preliminary Injunction Hearing	400	800
R. Lospennato	7/3/18	0.5	0.5	M/w Jon, Melanie, and Sarah to debrief the 6/28 PI hearing.	Preliminary Injunction Hearing - Debrief	400	200
R. Lospennato	7/3/18	2	2	M/w Katy, Chelsea, Emily, Jon, Melanie, and Sarah to discuss next steps, strategy, and class member correspondence.	Case Management - Team Meeting	400	800
R. Lospennato	7/4/18	2	2	Review and edit Jon's request to produce.	Request for Production	400	800
R. Lospennato	7/4/18	0.5	0.5	Talk to Miranda about her involvement in the case, putting together a discovery plan, and using Filemaker for the case.	Case Management - Document Management	400	200
R. Lospennato	7/5/18	3.5	3.5	Work on draft of Document Management protocol	Case Management - Document Management	400	1400
R. Lospennato	7/11/18	0.5	0.5	T/c with Kathy Burns on random sample and file reviews.	Working with Experts	400	200
R. Lospennato	7/12/18	1	1	Enter information on clients in database	Database	400	400
R. Lospennato	7/25/18	1	1	Review, organize and Tellis records for database	Database	400	400
R. Lospennato	7/26/18	2	2	Review, organize and Tellis records for database	Database	400	800

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
R. Lospennato	8/9/18	2	2	Review and edit reply memo; discuss with Jon.	Case Management	400	800
R. Lospennato	8/20/18	1	1	Draft and send memo regarding work product to Jon	Case Management	400	400
R. Lospennato	8/22/18	1	1	Received and reviewed letter from new DWCC writer; drafting response.	Case Matters	400	400
R. Lospennato	10/4/18	1	1	Meeting with potential co-counsel.	Case Management - Staffing	400	400
R. Lospennato	10/8/18	1	1	Meet with Chris and potential expert.	Case Management - Experts	400	400
R. Lospennato	10/12/18	1	1	Review research re contradiction of 30(b)(6) witnesses.	DWCC Visits	400	400
R. Lospennato	10/18/18	0.5	0.5	Review and begin editing Melanie's draft of opposition memo to Defendants' Motion to compel	Motion to Compel	400	200
R. Lospennato	10/19/18	1	1	Review and reorganize hard and digital case files.	Case Management - Document Management	400	400
R. Lospennato	10/24/18	2	2	Work on Opposition to Motion to Compel (am)	Motion to Compel	400	800
R. Lospennato	10/29/18	3	3	Meeting to review and compare this case and the Colorado Supermax case and to plan steps moving forward (am)	Legal Research	400	1200
R. Lospennato	10/29/18	4	4	Meeting to review and compare this case and the Colorado Supermax case and to plan steps moving forward (pm)	Legal Research	400	1600
R. Lospennato	10/31/18	1	1	Review and edit Katie's version of Opposition to Motion to Compel	Motion to Compel	400	400
R. Lospennato	10/31/18	1	1	Review and edit page 5-6 of Opposition to Motion to Compel to include reference to Chelsea's declaration	Motion to Compel	400	400
R. Lospennato	11/1/18	1	1	T/c regarding potential experts	Case Management - Experts	400	400
R. Lospennato	11/2/18	0.5	0.5	Research on Joshua Anderson, a forensic psychiatrist	Legal Research	400	200
R. Lospennato	11/2/18	1	1	T/c with Keith Fernandez re discovery issues. He says they will have everything by 11/2/1.	Discovery	400	400
R. Lospennato	11/2/18	1	1	Continue team meeting to discuss issues, pretrial dates and AC as party	Case Management - Team Meeting	400	400
R. Lospennato	11/15/18	0.5	0.5	Review order on PI re tier cameras. Send email to staff.	Preliminary Injunction	400	200
R. Lospennato	11/16/18	1	1	Send draft pleadings to team and discuss. Review email between Jon and Chris.	Pleadings	400	400
R. Lospennato	12/13/18	1	1	M/w with Jon, Melanie, Sarah, Katie, and Chelsea for planning meeting. Discussed status of discovery and interviews with clients.	Discovery	400	400
R. Lospennato	1/18/19	0.5	0.5	Review and reorganize data files.	Case Management - Document Management	400	200
R. Lospennato	1/18/19	1	1	M/w with DWCC team to discuss review of documents and prep for class action case.	Class Certification	400	400
R. Lospennato	1/25/19	1	1	Review Defendants Motion to Approve Class Communication and related documents.	Motion to Gain Access to Class Members	400	400
R. Lospennato	1/30/19	1	1	Review correspondence re state's motion for access to AC's clients and letter refusing request to visit DWCC and Jon's first draft of a memo re TRO	Motion for Access	400	400
R. Lospennato	1/30/19	0.5	0.5	M/w Jon, Sarah, and Melanie re correspondence with state regarding access to clients.	DWCC Visits	400	200
R. Lospennato	2/4/19	0.5	0.5	Review Defendants' Opposition to SJ and our reply. Issue is now before judge.	Motion for Summary Judgement	400	200
R. Lospennato	2/5/19	0.5	0.5	Meeting with Jon, Melanie and Sarah to prep for oral argument on TRO/PI	TRO	400	200
R. Lospennato	2/11/19	0.5	0.5	Review and edit memorandum in opposition Defendants' motion to approve communication with class	Motion to Gain Access to Class Members	400	200
R. Lospennato	2/20/19	1	1	Travel to and from Minden and DWCC for deposition of Aerial Robinson.	Deposition - Travel	400	400
R. Lospennato	2/20/19	3	3	Deposition of Aerial Robinson (am).	Deposition	400	1200
R. Lospennato	2/21/19	0.5	0.5	Travel from Minden to DWCC for deposition of Michelle Dauzat	Deposition - Travel	400	200
R. Lospennato	2/21/19	7.5	7.5	Drive home from Homer following deposition of Dauzat	Deposition - Travel	400	3000
R. Lospennato	3/1/19	0.5	0.5	Review memo again addressing rule 11 issue and do final edits	Rule 11 Issue	400	200
R. Lospennato	3/19/19	0.5	0.5	Review defendants' second motion for protective order, supporting memo, and motion setting order.	Motion for Protective Order	400	200
R. Lospennato	4/4/19	0.5	0.5	M/w with Jon, Melanie, and Sarah re decision.	Case Management - Team Meeting	400	200
R. Lospennato	5/2/19	0.5	0.5	Collect list of cases in which AC was a party and send to everyone.	Case Management	400	200
R. Lospennato	5/3/19	1	1	Search for records on three DWCC clients for interrogatory responses.	Discovery	400	400
R. Lospennato	5/7/19	1	1	Calendar pretrial order dates in appointments	Pre-Trial Orders	400	400
R. Lospennato	5/30/19	1	1	Modify the primary document layout to related clients and documents properly.	Case Management	400	400
R. Lospennato	6/13/19	1	1	M/w Melanie re tweaks to database to capture summary of records	Database	400	400
R. Lospennato	7/11/19	1	1	Research: review Pew report re prison healthcare cost issues	Legal Research	400	400
R. Lospennato	7/31/19	0.5	0.5	Review research on settlement agreements from law student	Settlement Agreement	400	200
R. Lospennato	8/29/19	0.5	0.5	Review resume and related info from Pacholke	Working with Experts	400	200
R. Lospennato	9/3/19	1	1	Review and edit mediation statement to court	Mediation	400	400
R. Lospennato	9/4/19	1	1	Review settlement agreement and send to Jon	Settlement Agreement	400	400
R. Lospennato	9/5/19	1	1	T/c and m/w Jon and Melanie on negotiations	Settlement Agreement	400	400
R. Lospennato	9/8/19	1	1	Prepare for trip to Monroe for mediation.	Mediation - Preparation	400	400
R. Lospennato	9/8/19	5.5	5.5	Drive to Monroe for Mediation; check-in and get settled.	DWCC Visits - Travel	400	2200
R. Lospennato	9/9/19	1	1	Prepare for Mediation with court.	Mediation - Preparation	400	400
R. Lospennato	10/9/19	0.5	0.5	Discussion with Jon and mail to NDRN re strategy	Case Management	400	200
R. Lospennato	11/11/19	0.5	0.5	Review Intervention pleadings for prep for Chris's deposition.	Deposition - Preparation	400	200
R. Lospennato	11/13/19	0.5	0.5	M/w Jon and review his research regarding 30(b)(6)	30(b)(6) Deposition	400	200
R. Lospennato	11/21/19	4.5	4.5	Defend Chris's deposition	Deposition	400	1800
R. Lospennato	3/27/20	0.5	0.5	Review answer to amended complaint	Complaint - Amended	400	200
R. Lospennato	6/22/20	1	1	M/w Jon and Emma re 30(b)(6) deposition.	Deposition	400	400
R. Lospennato	6/27/20	3.5	3.5	Prep for deposition (pm)	Deposition - Preparation	400	1400
R. Lospennato	6/29/20	4.5	4.5	Prep for deposition (pm)	Deposition - Preparation	400	1800
R. Lospennato	6/30/20	4.5	4.5	Testify at 30(b)(6) deposition (pm)	Deposition	400	1800
R. Lospennato	6/30/20	0.5	0.5	M/w Jon, Melanie, Katie, and Bruce re Testimony at 30(b)(6) deposition (pm)	Deposition	400	200
R. Lospennato	7/6/20	0.5	0.5	Review deposition	Deposition	400	200
R. Lospennato	7/8/20	1	1	Review North Carolina memo and research on 30(b)(6) issues.	Motion for Protective Order	400	400
R. Lospennato	7/9/20	1	1	Edit Emma's draft of my affidavit; send to group	Affidavits	400	400
R. Lospennato	7/11/20	2	2	Edit Memorandum In Support of Motion for Protective Order (pm)	Motion for Protective Order	400	800
R. Lospennato	7/30/20	0.5	0.5	Download and review Ds' Motion to Compel and response to Protective Order	Motion to Compel	400	200
R. Lospennato	8/3/20	0.5	0.5	M/w Jon, Melanie, and Emma re 30(b)(6) motions	Motion for Protective Order	400	200
R. Lospennato	8/13/20	0.5	0.5	Review final drafts of opposition to motion to compel and respond to emails from Katie	Motion to Compel	400	200
R. Lospennato	9/24/20	0.5	0.5	Review decision on motion to compel re 30(b)(6) deposition. Also researched 28 USC Sec 636 (b) for appeal rights.	Motion to Compel	400	200
R. Lospennato	9/27/20	0.5	0.5	M/w Jon, Melanie, and Emma re 30(b)(6) motions	Motion for Protective Order	400	200
R. Lospennato	9/30/20	0.5	0.5	T/c with NDRN associates re 30(b)(6).	Motion for Protective Order	400	200
R. Lospennato	10/6/20	3	3	Work on objection to magistrate judge's order re 30(b)(6) deposition (am)	30(b)(6) Deposition	400	1200
R. Lospennato	10/29/20	0.5	0.5	Review Defendants' Memorandum in Opposition to 30(b)(6) appeal. Doc. 378	30(b)(6) Deposition	400	200
R. Lospennato	11/2/20	0.5	0.5	Correct client IDs of 4 individuals in DWCC database	Database	400	200
R. Lospennato	11/24/20	0.5	0.5	Review and edit draft emails to Fernandez and meet with everyone re strategy	Case Management	400	200

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
R. Lospennato	12/26/20	0.5	0.5	Create database for 1/5 30(b)(6) deposition and import excel work sheet into database.	Motion for Protective Order	400	200
R. Lospennato	12/29/20	4	4	Begin prep for 30(b)(6) deposition; review depositions and build database	Motion for Protective Order	400	1600
R. Lospennato	1/3/21	6.5	6.5	Review requests to admit and other discovery documents as prep for 30(b)(6).	Motion for Protective Order	400	2600
R. Lospennato	1/5/21	1	1	Meet with counsel to debrief from 30(b)(6) deposition	Motion for Protective Order	400	400
R. Lospennato	3/23/21	0.5	0.5	Review my 30(b)(6) deposition transcript	Motion for Protective Order	400	200
R. Lospennato	6/10/21	0.5	0.5	Meeting to discuss Motion in Limine hearing scheduled for July. Discussed scope of testimony.	Motion in Limine	400	200
R. Lospennato	7/26/21	2	2	Hearing on Motion in Limine Motions.	Motion in Limine Hearing	400	800
R. Lospennato	8/4/21	0.5	0.5	T/c with Katie to discuss resources going forward.	Case Management - Staffing	400	200
R. Lospennato	8/5/21	1	1	Meeting with Wade team to discuss resources going forward.	Case Management	400	400
R. Lospennato	9/20/21	0.5	0.5	Download and review court's order granting class certification and discuss order with Melanie	Class Certification	400	200
R. Lospennato	7/14/22	0.5	0.5	Review final draft of letter re 30 (b)(6) being demanded by Defendants.	Motion for Protective Order	400	200
R. Lospennato	11/1/22	0.5	0.5	Review emails from and discuss with Dalton re depo. Download and review order on liability. Send email to staff re decision.	Case Management	400	200
R. Lospennato	11/7/22	3	3	Review decision and organize material for 30(b)(6)	30(b)(6) Deposition	400	1200
R. Lospennato	11/15/22	6	6	Prep for 30(b)(6) deposition	Deposition - Preparation	400	2400
E. Mueller	4/27/22	3	3	Reviewed materials sent by Ms. Bray in-between webinar sessions throughout the day to become familiar with records.	Case Management	225	675
E. Mueller	4/28/22	2	2	Reviewed materials in-between sessions (2)	Case Management	225	450
E. Mueller	4/28/22	1	1	and had a brief follow-up meeting with Ms. Bray at the end of the day regarding my assignments on the DWCC case (1)	Case Management	225	225
E. Mueller	4/29/22	5	5	Began Phase One of David Wade Doc Review. Entered information from all of the Classification Review Board files for better organization.	DWCC Doc Review	225	1125
E. Mueller	5/2/22	6	6	Continued Doc review for Classification Review Board, including creating bookmarks and breaking out relevant material.	DWCC Doc Review	225	1350
E. Mueller	5/3/22	6.5	6.5	Doc Review Phase I - Completed RFP 7 Class review board Sheet. Began Phase II - RFP 10R - MH Client Lists Sheet	RFP	225	1462.5
E. Mueller	5/4/22	6	6	Doc Review- Continued Phase II - RFP 10R - MH Client Lists Sheet	RFP	225	1350
E. Mueller	5/9/22	7	7	Phase II Doc Review	DWCC Doc Review	225	1575
E. Mueller	5/10/22	12	12	Doct review. Phase II: Color coding and RFP 7 and 10 started.	RFP	225	2700
E. Mueller	5/11/22	14	14	Doct review - Data entry -Phase II - Finished Supp Def 2 of both RFP 7 and 10 and started Supp Def 3 for RFP 10.	RFP	225	3150
E. Mueller	5/11/22	1	1	Doct Review - Meeting with Melanie to begin RFP 18 and 19 after 7 and 10 are completed	RFP	225	225
E. Mueller	5/17/22	0.5	0.5	Discussed with Melanie at the end of the day about what to start once I finish the RFP19 entries.	RFP	225	112.5
E. Mueller	5/17/22	7	7	Phase II - Remedy - RFP 19 UOR data entry.	RFP	225	1575
E. Mueller	5/19/22	1	1	DWCC Trial Team Meeting with Melanie Bray & Katie S	Case Management - Team Meeting	225	225
E. Mueller	5/23/22	6	6	Remedy phase II - View & transcribe body camera footage.	Case Matters	225	1350
E. Mueller	5/24/22	12	12	Remedy Phase II - View & transcribe body camera footage.	Case Matters	225	2700
E. Mueller	5/27/22	7	7	Remedy Phase II - View & transcribe body camera footage.	Case Matters	225	1575
E. Mueller	5/31/22	7	7	DW Discovery: Video review & transcription and data entry into Remedy Spreadsheet.	Discovery	225	1575
E. Mueller	6/2/22	7	7	DW Discovery: Video review & transcription and data entry into Remedy Spreadsheet.	Discovery	225	1575
E. Mueller	6/3/22	7	7	DW Discovery: Video review & transcription and data entry into Remedy Spreadsheet.	Discovery	225	1575
E. Mueller	6/6/22	8.5	8.5	DW Discovery: Video review & transcription and data entry into Remedy Spreadsheet.	Discovery	225	1912.5
E. Mueller	6/7/22	6.5	6.5	DW Discovery: Video review & transcription and data entry into Remedy Spreadsheet.	Discovery	225	1462.5
E. Mueller	6/8/22	7.5	7.5	DW Discovery: Video review & transcription and data entry into Remedy Spreadsheet.	Discovery	225	1687.5
E. Mueller	6/9/22	1	1	DWCC Zoom meeting	Case Management	225	225
E. Mueller	6/10/22	6.5	6.5	DW Discovery: Video review & transcription and data entry into Remedy Spreadsheet.	Discovery	225	1462.5
E. Mueller	6/13/22	8	8	DWCC Doct Review and Data Entry	DWCC Doc Review	225	1800
E. Mueller	6/14/22	8.5	8.5	DWCC Doct Review and Data Entry	DWCC Doc Review	225	1912.5
E. Mueller	6/15/22	7	7	DWCC Doct Review and Data Entry	DWCC Doc Review	225	1575
E. Mueller	6/16/22	2	2	DWCC Team Meeting	Case Management - Team Meeting	225	450
E. Mueller	6/16/22	8	8	DWCC Doct Review and Data Entry	DWCC Doc Review	225	1800
E. Mueller	6/17/22	7.5	7.5	DWCC Doct Review and Data Entry	DWCC Doc Review	225	1687.5
E. Mueller	6/21/22	7	7	DWCC Doct Review and Data Entry (Dr. Seal Notes)	DWCC Doc Review	225	1575
E. Mueller	6/22/22	8	8	DWCC Doct Review and Data Entry (Dr. Seal Notes)	DWCC Doc Review	225	1800
E. Mueller	6/23/22	8	8	DWCC Doct Review and Data Entry (Dr. Seal Notes)	DWCC Doc Review	225	1800
E. Mueller	6/24/22	8	8	DWCC Doct Review and Data Entry (Dr. Seal Notes)	DWCC Doc Review	225	1800
E. Mueller	6/26/22	6	6	Drove to Ruston for DWCC site visit with the experts the following week	DWCC Visits - Travel	225	1350
E. Mueller	6/27/22	6	6	DWCC Site Visit. Tier Walk Through Interviews with Experts Craig and Dan.	DWCC Visits	225	1350
E. Mueller	6/27/22	1	1	Dinner with Experts - discussed our next moves	DWCC Visits - Preparation	225	225
E. Mueller	6/27/22	2	2	Conferring with Melanie and Dalton	Vague	225	450
E. Mueller	6/27/22	1	1	Began my own spreadsheet for tier walk through interviews	DWCC Visits - Preparation	225	225
E. Mueller	6/28/22	1	1	Met up with the Experts and Legal Team	DWCC Visits - Preparation	225	225
E. Mueller	6/29/22	8	8	DWCC Site Visit. Individual interviews with clients done by Experts.	DWCC Visits	225	1800
E. Mueller	6/30/22	7.5	7.5	DWCC Site Visit. Legal team conducted individual interviews with clients.	DWCC Visits	225	1687.5
E. Mueller	6/30/22	1	1	Dinner with Legal team to discuss the day's interviews and next	DWCC Visits - Preparation	225	225
E. Mueller	7/1/22	6.5	6.5	Drive home from Ruston after completing DWCC site visit. (9am-around 330pm)	DWCC Visits - Travel	225	1462.5
E. Mueller	7/5/22	8	8	Completed all of Dr. Seal's notes for the doc review spreadsheet	Working with Experts	225	1800
E. Mueller	7/6/22	7	7	DWCC - updated Def4 responses RFP 22R Prisoner Records. Called and left a VM with parents of class member @4pm.	RFP	225	1575
E. Mueller	7/6/22	0.5	0.5	Call with parents of class member	Client Communications - Relative	225	112.5
E. Mueller	7/7/22	8	8	Doct review and data entry for RFP 33 Def most recent response (half way finished)	RFP	225	1800
E. Mueller	7/8/22	7	7	Finished Doct review/data entry for RFP 33 of Def latest responses	RFP	225	1575
E. Mueller	7/11/22	7	7	Transcribed videos	Case Matters	225	1575
E. Mueller	7/12/22	6	6	DWCC transcribe videos, updated spreadsheets	Case Matters	225	1350
E. Mueller	7/13/22	8	8	DWCC RFP 3R UOR edit entire spreadsheet for expert discovery purposes	Unusual Occurrence Report	225	1800
E. Mueller	7/14/22	9	9	DWCC RFP 3R UOR edit entire spreadsheet for expert discovery.	Unusual Occurrence Report	225	2025

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
E. Mueller	7/15/22	10	10	DWCC RFP 3R UOR Edit spreadsheet for expert discovery purposes.	Unusual Occurrence Report	225	2250
E. Mueller	7/16/22	5	5	DWCC RFP 3R UOR Edit spreadsheet for expert discovery purposes.	Unusual Occurrence Report	225	1125
E. Mueller	7/17/22	5	5	DWCC RFP 3R UOR Edit spreadsheet for expert discovery purposes. COMPLETE	Unusual Occurrence Report	225	1125
E. Mueller	7/18/22	7	7	DWCC Remedy Phase spreadsheet update with last Supp from defendants	Case Matters	225	1575
E. Mueller	7/19/22	6.5	6.5	DWCC Remedy Phase spreadsheet update with last Supp from defendants	Case Matters	225	1462.5
E. Mueller	7/20/22	7.5	7.5	DWCC Remedy Phase spreadsheet update with last Supp from defendants	Case Matters	225	1687.5
E. Mueller	7/21/22	8	8	DWCC Remedy Phase spreadsheet update with last Supp from defendants	Case Matters	225	1800
E. Mueller	7/21/22	1	1	DWCC Meeting	Case Management	225	225
E. Mueller	7/22/22	9	9	DWCC Remedy Phase spreadsheet update with last Supp from defendants	Case Matters	225	2025
E. Mueller	7/23/22	2	2	Finished up last RFP section to update Remedy spreadsheet	Case Management	225	450
E. Mueller	7/25/22	6	6	DWCC Doct review	DWCC Doc Review	225	1350
E. Mueller	7/26/22	7	7	DWCC Doct Review - finished RFP26 for the def5 response	RFP	225	1575
E. Mueller	7/27/22	7	7	DWCC Doct Review - Continued spreadsheet with Def 5 Supp	DWCC Doc Review	225	1575
E. Mueller	7/28/22	8	8	DWCC Doct Review - CO-5 report	DWCC Doc Review	225	1800
E. Mueller	7/29/22	7	7	DWCC Doct Review - Completed the new CO-5 Report spreadsheet and continued additional review for videos.	DWCC Doc Review	225	1575
E. Mueller	8/1/22	7.5	7.5	DWCC Doct Review - Finished all Def 5 supps	DWCC Doc Review	225	1687.5
E. Mueller	8/2/22	6.5	6.5	DWCC Doct Review - Continued looking for video examples and continued updating the spreadsheets	DWCC Doc Review	225	1462.5
E. Mueller	8/5/22	5.5	5.5	DWCC Doct Review - Videos transcribed, email to the DWCC team	DWCC Doc Review	225	1237.5
E. Mueller	8/9/22	6.5	6.5	DWCC Doct Review - Video review/transcriptions	DWCC Doc Review	225	1462.5
E. Mueller	8/10/22	8	8	DWCC Doct Review - Video review/transcriptions - info placed in RFP 3R Spreadsheet.	RFP	225	1800
E. Mueller	8/11/22	7	7	DWCC Doct Review - Video review/transcriptions; Video search and cross ref with UORs	Unusual Occurrence Report	225	1575
E. Mueller	8/12/22	4	4	Deposition Preparation/narrations for Dalton	Deposition - Preparation	225	900
E. Mueller	8/15/22	5.5	5.5	DWCC spreadsheet proofreading for RFP 3R & 4R; cont video review; looked for additional supp's to add to the spreadsheets.	RFP	225	1237.5
E. Mueller	8/16/22	9	9	DWCC Doct Review: Completed last video transcription to upload; Organized Dropbox video folders; Updated the spreadsheet. Received new Doct review tasks from Melanie to update the spreadsheets with supp info to add.	DWCC Doc Review	225	2025
E. Mueller	8/17/22	6	6	DWCC - Doct Review - Finalized 13R with info and org review; started an finished 1st draft of RFP 14R.	RFP	225	1350
E. Mueller	8/18/22	7.5	7.5	DWCC - Doct Review - Finished 14R (proofed) and 21R (proofed); Started Review and Data Entry for RFP 23R - LDPSC Regs and Forms - via PDF files in Def3-3rd Supp	Block Billing	225	1687.5
E. Mueller	8/19/22	7	7	DWCC Doct Review - Over half way through entering LDPSC Regs and Forms into RFP 23R spreadsheet.	RFP	225	1575
E. Mueller	8/22/22	8	8	Finished RFP 23 - LDPSC Regs	RFP	225	1800
E. Mueller	8/30/22	5	5	DWCC RFP 22 & 36R Bookmarking and organizing folders. Found a better way to bookmark to make creating the summary quicker and easier.	RFP	225	1125
E. Mueller	9/7/22	5	5	DWCC Doct Rev - RFP36	RFP	225	1125
E. Mueller	9/13/22	7.5	7.5	DWCC Doct Rev-RFP 36R-Indiv Records-Cont PDF Bookmarking	RFP	225	1687.5
E. Mueller	9/14/22	7.5	7.5	DWCC Doct Rev-RFP 36R-Indiv Records-Finished PDF Bookmarks for 12 folders	RFP	225	1687.5
E. Mueller	9/16/22	4	4	DWCC Doct Rev-RFP 36R-Indiv-last summary of MPRs almost done	RFP	225	900
E. Mueller	9/19/22	6	6	DWCC Doct Review-RFP 36R Summaries	RFP	225	1350
E. Mueller	9/20/22	6	6	Doct Review for DWCC-RFP 36 Med/MH Summaries cont...	RFP	225	1350
E. Mueller	9/23/22	5.5	5.5	DWCC Doct Review-RFP 36 Med/MH Summaries cont...	RFP	225	1237.5
E. Mueller	9/26/22	5.5	5.5	Continue to work on the RFP 36R - Individual records - Creating individual summaries	RFP	225	1237.5
E. Mueller	10/3/22	6	6	DWCC Doct Review- Summary for each Indiv Record-Remedy Phase	DWCC Doc Review	225	1350
E. Mueller	10/5/22	6	6	DWCC Doct Review- Summary for each Indiv Record-Remedy Phase	DWCC Doc Review	225	1350
E. Mueller	10/6/22	1	1	DWCC Weekly meeting via Zoom	Case Management - Team Meeting	225	225
E. Mueller	10/6/22	6	6	DWCC Doct Review Summary for each Indiv Record	DWCC Doc Review	225	1350
E. Mueller	10/7/22	7.5	7.5	DWCC Doct Review- Identified additional Indiv Record that need to be bookmarked and summarized -Remedy Phase	DWCC Doc Review	225	1687.5
E. Mueller	10/10/22	6	6	DWCC Doct Review- Identified additional Indiv Record that need to be bookmarked and summarized -Remedy Phase	DWCC Doc Review	225	1350
E. Mueller	10/11/22	6.5	6.5	DWCC Doct Review- Identified additional Indiv Record that need to be bookmarked and summarized -Remedy Phase	DWCC Doc Review	225	1462.5
E. Mueller	10/12/22	6.5	6.5	DWCC Doct Review- Identified additional Indiv Record that need to be bookmarked and summarized -Remedy Phase	DWCC Doc Review	225	1462.5
E. Mueller	10/14/22	5.5	5.5	DWCC Doct Review- Identified additional Indiv Record that need to be bookmarked and summarized -Remedy Phase Continues	DWCC Doc Review	225	1237.5
E. Mueller	10/18/22	10	10	DWCC Doct Review-Indiv records	DWCC Doc Review	225	2250
E. Mueller	10/19/22	8	8	DWCC Doct Review-Indiv Records	DWCC Doc Review	225	1800
E. Mueller	10/20/22	7	7	DWCC Doct Review-Indiv records Finished	DWCC Doc Review	225	1575
E. Mueller	11/1/22	3	3	DWCC Decision by Judge Foote read through and notations	Case Matters	225	675
E. Mueller	11/3/22	1	1	DWCC Legal team meeting	Case Management - Team Meeting	225	225
L. O'Brien	10/28/19	5.5	5.5	Letters to Wade prisoners	Client Letters	108	594
L. O'Brien	10/29/19	6	6	Letter to Wade prisoners	Client Letters	108	648
L. O'Brien	11/3/20	5	5	Review and responding to inmate letters	Inmate Letters	108	540
P. Birk	6/13/22	1	1	Case work training meeting with Melanie (1.0)	Case Management - Staffing	108	108
P. Birk	6/13/22	1	1	Scanning newly received DoC letters into DropBox (1.0)	Inmate Letters	108	108
P. Birk	6/14/22	3	3	In-person DWCC meeting (3.0)	DWCC Visits	108	324
P. Birk	6/14/22	0.5	0.5	Reviewing old memos in preparation for creating new memos (.5)	Case Management	108	54
P. Birk	6/16/22	3	3	DWCC weekly meeting (.3)	Case Management - Team Meeting	108	324
P. Birk	6/17/22	4.5	4.5	Reviewing scanned DoC letters, taking notes, and creating memos (4.5)	Inmate Letters	108	486
P. Birk	6/21/22	4.5	4.5	Reviewing scanned DoC letters, taking notes, and creating memos (4.5)	Inmate Letters	108	486
P. Birk	6/22/22	0.5	0.5	Organizing physical letters (.5)	Inmate Letters	108	54
P. Birk	6/22/22	0.5	0.5	Meeting with Melanie re: using VineLink and intro to FileMaker timesheets (.5)	Case Management - Document Management	108	54
P. Birk	6/22/22	0.5	0.5	Reviewing memos and flagging concerns on shared spreadsheet (.5)	Case Matters	108	54
P. Birk	6/23/22	1	1	Reviewing old outgoing DoC letters (1.0)	Client Communications	108	108
P. Birk	6/23/22	0.5	0.5	Creating outgoing letter template (.5)	Client Communications	108	54

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
P. Birk	6/23/22	3	3	Drafting letter responses onto memos (3.0)	Inmate Response Letters	108	324
P. Birk	6/24/22	1	1	Scanning and naming new DoC letters, saving to DropBox folder (1.0)	Inmate Letters	108	108
P. Birk	6/24/22	4	4	Drafting letter responses onto memos (4.0)	Inmate Response Letters	108	432
P. Birk	6/29/22	4.5	4.5	Reviewing letters, creating memos, drafting letter responses (4.5)	Inmate Response Letters	108	486
P. Birk	6/30/22	4.5	4.5	Renaming other letters, reviewing letters, creating memos, and drafting responses (4.5)	Inmate Response Letters	108	486
P. Birk	7/5/22	3	3	Reviewing, memo'ing, and drafting responses for new letters (3.0)	Inmate Response Letters	108	324
P. Birk	7/7/22	0.5	0.5	Combining and formatting trial transcripts into one big pdf file (.5)	Case Management - Document Management	108	54
P. Birk	7/8/22	2	2	Reviewing, memo'ing, and drafting responses to new letters (2.0)	Inmate Response Letters	108	216
P. Birk	7/12/22	2	2	Reviewing, memoing, and drafting responses to letters (2.0)	Inmate Response Letters	108	216
P. Birk	7/14/22	4.5	4.5	Sorting, inspecting, and pulling envelopes for binders (4.5)	Case Management - Administrative Tasks	108	486
P. Birk	7/18/22	1	1	Organizing DWCC weekly intake folder on dropbox (1.0)	Case Management - Document Management	108	108
P. Birk	7/18/22	0.5	0.5	Further dropbox folder cleanup (.5)	Case Management - Document Management	108	54
P. Birk	7/18/22	2	2	Pulling more envelopes (2.0)	Mass Mailing	108	216
P. Birk	7/19/22	2	2	Pulling envelopes (2.0)	Mass Mailing	108	216
P. Birk	7/19/22	0.5	0.5	Reviewing response letters and pulling together enclosures (.5)	Inmate Response Letters	108	54
P. Birk	7/19/22	0.5	0.5	Scanning and saving new letters (.5)	Inmate Letters	108	54
P. Birk	7/19/22	2	2	Pulling more envelopes (2.0)	Mass Mailing	108	216
P. Birk	7/20/22	2	2	Spreadsheets envelopes (2.0)	Mass Mailing	108	216
P. Birk	7/21/22	1	1	Printing response letters (1.0)	Inmate Response Letters	108	108
P. Birk	7/21/22	0.5	0.5	Prepping envelopes and printing postage (.5)	Mass Mailing	108	54
P. Birk	7/22/22	0.5	0.5	Taking letters to post office (.5)	Mass Mailing	108	54
P. Birk	7/25/22	0.5	0.5	Checking mail, scanning and saving letters (.5)	Inmate Letters	108	54
P. Birk	7/26/22	0.5	0.5	Discussing letters, scans, and strategy with MB (.5)	Inmate Letters	108	54
P. Birk	7/27/22	0.5	0.5	Scanning and saving new letters (.5)	Inmate Letters	108	54
P. Birk	8/3/22	5.5	5.5	Reviewing letters, writing memos, drafting responses (5.5)	Inmate Response Letters	108	594
P. Birk	8/4/22	0.5	0.5	Scanning releases (.5)	Case Management - Administrative Tasks	108	54
P. Birk	8/8/22	0.5	0.5	Researching returned letters' recipient statuses (.5)	Client Communications	108	54
P. Birk	8/11/22	0.5	0.5	Scanning new letters (.5)	Inmate Letters	108	54
P. Birk	8/11/22	0.5	0.5	Reviewing new letters prior to weekly DWCC meeting (.5)	Inmate Letters	108	54
P. Birk	8/17/22	0.5	0.5	Scanning and saving new letters (.5)	Inmate Letters	108	54
P. Birk	8/18/22	3	3	Reviewing, memo'ing, and drafting responses to letters (3.0)	Inmate Response Letters	108	324
P. Birk	8/19/22	3	3	Reviewing, memo'ing, and drafting responses to letters (3.0)	Inmate Response Letters	108	324
P. Birk	8/22/22	3	3	Reviewing, memo'ing, and drafting responses to letters (3.0)	Inmate Response Letters	108	324
P. Birk	8/29/22	2	2	Reviewing, memo'ing, and drafting responses to letters (2.0)	Inmate Response Letters	108	216
P. Birk	8/30/22	0.5	0.5	Printing stamps and sourcing envelopes (.5)	Mass Mailing	108	54
P. Birk	8/30/22	2	2	Scanning, reviewing, memo'ing, and drafting responses to letters (2.0)	Inmate Response Letters	108	216
P. Birk	8/31/22	2	2	Prepping individual templates for upcoming outgoing response letters (2.0)	Inmate Response Letters	108	216
P. Birk	8/31/22	0.5	0.5	Printing and prepping to mail response letter to TB (.5)	Inmate Response Letters	108	54
P. Birk	8/31/22	0.5	0.5	Copying original documents for our records - from those who requested we send their originals back to them (.5)	Case Management - Document Management	108	54
P. Birk	9/1/22	0.5	0.5	Checking old memos and copies of letters that were found in LO's desk to ensure they are in DropBox (.5)	Client Communications	108	54
P. Birk	9/1/22	1	1	Scanning and saving documents from June site visit (1.0)	DWCC Visit Memos	108	108
P. Birk	9/2/22	0.5	0.5	Printing documents and prepping for deposition (.5)	Deposition - Preparation	108	54
P. Birk	9/2/22	0.5	0.5	Scanning, reviewing, memo'ing, and drafting response to one new letter (.5)	Inmate Response Letters	108	54
P. Birk	9/6/22	0.5	0.5	Reviewing list of requested attorney calls, double-checking for accuracy and urgency (.5)	Case Management	108	54
P. Birk	9/7/22	0.5	0.5	Printing requested documents and prepping letters (.5)	Mass Mailing	108	54
P. Birk	9/8/22	1	1	DWCC weekly meeting (1.0)	Case Management - Team Meeting	108	108
P. Birk	9/8/22	2	2	Printing and prepping responses to mail out (2.0)	Inmate Response Letters	108	216
P. Birk	9/8/22	0.5	0.5	Taking letters to the post office (.5)	Client Communications	108	54
P. Birk	9/9/22	1	1	Updating memos and responses for a few letters (1.0)	Inmate Response Letters	108	108
P. Birk	9/12/22	1	1	Cleaning up DropBox intake folder (1.0)	Case Management - Document Management	108	108
P. Birk	9/13/22	1	1	Updating and organizing DropBox files to reflect sent letters and housing changes (1.0)	Case Management - Document Management	108	108
P. Birk	9/14/22	1	1	Reviewing past correspondences and updating CP draft response (1.0)	Case Management	108	108
P. Birk	9/15/22	1	1	Scan, save, review, memo, and draft response to 2 new letters (1.0)	Inmate Response Letters	108	108
P. Birk	9/26/22	1	1	Opening, scanning, and saving new letters (1.0)	Inmate Letters	108	108
P. Birk	9/28/22	3	3	Reviewing, memoing, and drafting responses to letters (3.0)	Inmate Response Letters	108	324
P. Birk	9/29/22	2	2	Reviewing, memoing, drafting responses to letters (2.0)	Inmate Response Letters	108	216
P. Birk	10/3/22	3	3	Reviewing and memo'ing documents from Walkthrough; drafting responses where warranted (3.0)	Case Management	108	324
P. Birk	10/3/22	0.5	0.5	Reviewing, memo'ing, and drafting response to new letter (.5)	Inmate Response Letters	108	54
P. Birk	10/4/22	6	6	Updating extended list for mass mailing; correcting inaccurate names and DoC #s on individual complainants folders (6.0)	Mass Mailing	108	648
P. Birk	10/5/22	3	3	Reviewing, memo'ing, and drafting responses to new letters (3.0)	Inmate Response Letters	108	324
P. Birk	10/10/22	0.5	0.5	Organizing scanned letters and re-scanning envelope (.5)	Inmate Letters	108	54
P. Birk	10/10/22	0.5	0.5	Scanning new letters (.5)	Inmate Letters	108	54
P. Birk	10/11/22	0.5	0.5	Scanning new letters (.5)	Inmate Letters	108	54
P. Birk	10/11/22	4.5	4.5	Reviewing, memo'ing, and drafting responses to letters (4.5)	Inmate Response Letters	108	486
P. Birk	10/12/22	1	1	Photographing, inspecting, and preserving AD enclosure (1.0)	Case Management	108	108
P. Birk	10/13/22	0.5	0.5	Uploading photos of AD enclosure, adding to memo, and updating memo (.5)	Case Management	108	54
P. Birk	10/13/22	3	3	Prepping letters for mass mailing (3.0)	Mass Mailing	108	324
P. Birk	10/14/22	6	6	Prepping letters / envelopes for mass mailing (6.0)	Mass Mailing	108	648
P. Birk	10/19/22	3.5	3.5	Reviewing, memo'ing, and drafting responses to letters (3.5)	Inmate Response Letters	108	378
P. Birk	10/19/22	3	3	Digging through previous notes and memos to determine whom we may want to talk to (3.0)	Case Management	108	324
P. Birk	10/25/22	0.5	0.5	Scanning new letters (.5)	Inmate Letters	108	54
P. Birk	10/31/22	3	3	Saving, reviewing, memo'ing, and drafting responses to letters (3.0)	Inmate Response Letters	108	324
P. Birk	11/3/22	1	1	Weekly DWCC meeting (1.0)	Case Management - Team Meeting	108	108
P. Birk	11/3/22	3.5	3.5	Reviewing, memo'ing, and drafting responses to letters (3.5)	Inmate Response Letters	108	378
P. Birk	11/4/22	3.5	3.5	Reviewing, memo'ing, and drafting responses to letters (3.5)	Inmate Response Letters	108	378
P. Birk	11/8/22	3	3	Reviewing, memo'ing, and drafting responses to letters (3.0)	Inmate Response Letters	108	324
P. Birk	11/9/22	1	1	Printing labels, sourcing stamps, and prepping envelopes to mail out (1.0)	Mass Mailing	108	108
P. Birk	11/15/22	0.5	0.5	Calling jails looking for BC (.5)	Case Management	108	54
P. Birk	11/16/22	2	2	Scanning new letters including bulky enclosures; re-scanning after copier failure (2.0)	Inmate Letters	108	216
P. Birk	11/17/22	1	1	Quick-reviewing new letters and emailing DC and MB (1.0)	Inmate Letters	108	108
P. Birk	11/22/22	0.5	0.5	Scanning and saving new and returned letters (.5)	Inmate Letters	108	54
P. Birk	12/1/22	1	1	DWCC weekly meeting (1.0)	Case Management - Team Meeting	108	108

Detailed Time Entries - Half-Hour Increments						Exhibit 1	
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
P. Birk	12/6/22	4	4	Reviewing, memo'ing, and drafting responses to letters, inc. several very long letters from RH (4.0)	Inmate Response Letters	108	432
P. Birk	12/7/22	3	3	Reviewing, memo'ing, and drafting responses to letters (3.0)	Case Management	108	324
P. Birk	12/12/22	0.5	0.5	Scanning and saving new letters (.5)	Inmate Letters	108	54
P. Birk	12/12/22	0.5	0.5	Reviewing prior correspondence from writers (.5)	Client Communications	108	54
P. Birk	12/13/22	2	2	Reviewing, memo'ing, and drafting responses to letters (2.0)	Inmate Response Letters	108	216
P. Birk	12/13/22	0.5	0.5	Organizing DropBox Intake folder (.5)	Case Management - Document Management	108	54
P. Birk	12/13/22	0.5	0.5	Reviewing past correspondence and visit memo from DO; drafting email to team re: his voicemail and callback (.5)	Case Management	108	54
P. Birk	12/14/22	1	1	Verifying locations on VineLink and prepping outgoing letter templates, continued; updating responses where necessary (1.0)	Inmate Response Letters	108	108
P. Birk	12/19/22	0.5	0.5	Scanning and saving new letters (.5)	Inmate Letters	108	54
P. Birk	12/19/22	2	2	Reviewing, memo'ing, and drafting responses to letters (2.0)	Inmate Response Letters	108	216
P. Birk	12/19/22	0.5	0.5	Scanning more new letters after mail delivery (.5)	Inmate Letters	108	54
P. Birk	12/21/22	3	3	Reviewing, memo'ing, and drafting responses to letters (3.0)	Inmate Response Letters	108	324
P. Birk	12/21/22	0.5	0.5	Scanning new letters (.5)	Inmate Letters	108	54
P. Birk	12/21/22	1	1	Calling facilities to verify housing and attempting to schedule attorney phone calls (1.0)	Case Management	108	108
P. Birk	12/22/22	0.5	0.5	Returning call to MS on behalf of JD (.5)	Case Management	108	54
P. Birk	12/23/22	1	1	Reviewing, memo'ing, and drafting responses to letters (1.0)	Inmate Response Letters	108	108
P. Birk	12/27/22	4.5	4.5	Reviewing, memo'ing, drafting responses to, and prepping response templates for new letters (4.5)	Inmate Response Letters	108	486
P. Birk	1/3/23	0.5	0.5	Updating oldest draft responses to reflect updates	Case Management	108	54
P. Birk	1/4/23	1	1	Updating draft responses	Case Management	108	108
P. Birk	1/4/23	2	2	Updating more draft responses	Inmate Response Letters	108	216
P. Birk	1/5/23	1	1	Updating more draft responses	Inmate Response Letters	108	108
P. Birk	1/5/23	8.5	8.5	Printing exhibits	Trial Preparation	108	918
P. Birk	1/6/23	6	6	Printing and prepping exhibits (6.0)	Trial Preparation	108	648
P. Birk	1/9/23	2	2	Updating outdated responses for mailing	Inmate Response Letters	108	216
P. Birk	1/10/23	0.5	0.5	Prepping response letters to mail out	Inmate Response Letters	108	54
P. Birk	1/10/23	0.5	0.5	Setting up conference room in anticipation of pretrial conf.	Joint Pre Trial Conference (JPTO)	108	54
P. Birk	1/10/23	1	1	Viewing some P-D exhibits to prep for Trial	Trial Exhibits	108	108
P. Birk	1/10/23	0.5	0.5	Tidying up from weekend print job	Case Management	108	54
P. Birk	1/11/23	0.5	0.5	Prepping for pretrial conference	Joint Pre Trial Conference (JPTO)	108	54
P. Birk	1/11/23	3	3	Reviewing exhibits to prep for trial	Trial Exhibits	108	324
P. Birk	1/11/23	0.5	0.5	Emailing notes from pretrial conference to team	Joint Pre Trial Conference (JPTO)	108	54
P. Birk	1/13/23	2	2	Traveling downtown to A&R to get visitor passes and discuss logistics for trial	Travel	108	216
P. Birk	1/17/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/17/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/18/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/18/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/19/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/19/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/20/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/20/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/23/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/23/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/24/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/24/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/25/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/25/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/26/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/26/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/27/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/27/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/30/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/30/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	1/31/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	1/31/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	2/1/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	2/1/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	2/2/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	2/2/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	2/3/23	0.5	0.5	Traveling downtown for Remedy Phase Zoom Trial	Travel	108	54
P. Birk	2/3/23	0.5	0.5	Housekeeping matters after Court adjourned	Case Management	108	54
P. Birk	2/6/23	0.5	0.5	Traveling downtown for Remedy phase trial	Travel	108	54
P. Birk	2/6/23	0.5	0.5	Traveling home from trial	Travel	108	54
P. Birk	2/7/23	0.5	0.5	Creating post-trial deadline memo	Post Trial	108	54
P. Birk	2/7/23	0.5	0.5	Updating DWCC calendar to reflect post-trial deadlines	Case Management - Planning	108	54
P. Birk	2/7/23	4	4	Reviewing, memo'ing, and drafting responses to letters	Inmate Response Letters	108	432
P. Birk	2/8/23	1	1	Scanning newly-received letters	Case Management	108	108
P. Birk	2/8/23	1	1	Returning missed calls from DWCC family members	Client Communications - Relative	108	108
P. Birk	2/10/23	2	2	Returning more calls from DWCC family members	Client Communications - Relative	108	216
P. Birk	2/10/23	0.5	0.5	Scanning new letters and prepping memo templates	Inmate Letters	108	54
P. Birk	2/13/23	0.5	0.5	Consolidating notes from during Trial	Post Trial	108	54
P. Birk	2/13/23	3.5	3.5	Memo'ing recent calls	Case Management	108	378
P. Birk	2/14/23	0.5	0.5	Discussing coverage with MB and making sure everything is tied up prior to maternity leave	Staffing Matters	108	54
P. Birk	2/15/23	5	5	Pulling together our admitted exhibits, attempting to relabel them with PR designations, troubleshooting Kofax, discussing issues with DC and EM	Trial Exhibits	108	540
P. Birk	2/22/23	1	1	Scanning new letters, resyncing copier, scanning again	Inmate Letters	108	108
P. Birk	2/23/23	0.5	0.5	Scanning new letters	Inmate Letters	108	54
P. Birk	2/23/23	0.5	0.5	Reading over MP case file and assessing status for callback	Case Management	108	54
P. Birk	2/23/23	0.5	0.5	Making callbacks to DWCC family members from voicemails / front desk emails	Client Communications - Relative	108	54
P. Birk	2/23/23	2	2	Updating drafted responses, printing and prepping response letters to send out	Inmate Response Letters	108	216
P. Birk	2/24/23	0.5	0.5	Meeting w/ DC to look over exhibits	Trial Exhibits	108	54
P. Birk	2/24/23	2	2	Burning CDs and double-checking exhibits	Trial Exhibits	108	216
P. Birk	2/24/23	2	2	Updating drafted responses, printing and prepping letters to mail out	Inmate Response Letters	108	216
P. Birk	2/24/23	1	1	Drafting and re-drafting cover letter for sending exhibits to the Court	Trial Exhibits	108	108
P. Birk	2/27/23	0.5	0.5	Returning DoC calls to confirm our office sent recent letters	Case Management	108	54
P. Birk	2/27/23	3.5	3.5	Updating oldest drafted responses and prepping outgoing letters to print	Inmate Response Letters	108	378
P. Birk	2/28/23	1	1	Printing enclosures for letters, prepping mail to go out and scanning envelopes	Mass Mailing	108	108
P. Birk	3/1/23	1	1	Organizing files in DropBox to reflect recently processed letters and move them into individual folders	Client Communications	108	108

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
P. Birk	3/1/23	1	1	Drafting mass mailing update letter	Mass Mailing	108	108
P. Birk	3/1/23	4	4	Sourcing envelopes, attaching postage stamps, stamping with "legal" and "confidential" ink stamps; refilling ink stamps	Mass Mailing	108	432
P. Birk	3/2/23	2	2	Finishing ink stamping envelopes	Mass Mailing	108	216
P. Birk	3/2/23	4	4	Looking up more locations via VineLink (through the end of the p-last names)	Client Communications	108	432
P. Birk	3/3/23	0.5	0.5	Printing address labels	Mass Mailing	108	54
P. Birk	3/3/23	2	2	Folding letters and stuffing envelopes	Mass Mailing	108	216
P. Birk	3/4/23	3.5	3.5	Finishing folding letters and stuffing envelopes (3.5)	Mass Mailing	108	378
P. Birk	3/13/23	0.5	0.5	Checking sent letters and responding to DoC confirmation requests	Client Communications	108	54
P. Birk	3/13/23	0.5	0.5	Searching transcripts, records, and online to verify spellings for Court Reporter	Case Management	108	54
P. Birk	3/13/23	0.5	0.5	Checking extended list to confirm lots of letters for LSP, sending confirmation emails to mail room associate	Client Communications	108	54
P. Birk	3/13/23	0.5	0.5	Scanning and saving new letters	Inmate Letters	108	54
P. Birk	3/14/23	4	4	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	432
P. Birk	3/15/23	1	1	Reviewing PRRs and drafting Hayden arrest records request	Case Management	108	108
P. Birk	3/15/23	4.5	4.5	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	486
P. Birk	3/16/23	0.5	0.5	Attempting callbacks to DWCC family callers and leaving voicemails	Client Communications - Relative	108	54
P. Birk	3/16/23	2	2	Reviewing, memo'ing, and drafting responses to backlogged letters and organizing DropBox files	Inmate Response Letters	108	216
P. Birk	3/17/23	0.5	0.5	Attempting callbacks to DWCC family members and leaving voicemails (.5)	Client Communications - Relative	108	54
P. Birk	3/18/23	6	6	Searching through remedy phase trial transcripts and pulling out citations on specific topics to contribute to post trial briefing (6.0)	Post Trial Brief	108	648
P. Birk	3/20/23	0.5	0.5	Opening, scanning, and saving new letters	Inmate Letters	108	54
P. Birk	3/21/23	0.5	0.5	Making DWCC family calls to return voicemails; leaving voicemails for callers	Client Communications - Relative	108	54
P. Birk	3/22/23	2	2	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	216
P. Birk	3/23/23	0.5	0.5	Opening, scanning, and saving new letters (.5)	Inmate Letters	108	54
P. Birk	3/24/23	0.5	0.5	Looking up and reviewing prior correspondence with AT after reading article	Case Management	108	54
P. Birk	3/28/23	6.5	6.5	Digging through Trial transcript to pull examples; reading over posttrial brief draft; drafting paragraphs on requested topics and submitting to DC (6.5)	Post Trial Brief	108	702
P. Birk	3/30/23	11	11	Assisting with posttrial brief drafting (11.0)	Post Trial Brief	108	1188
P. Birk	3/31/23	11.5	11.5	Assisting with posttrial brief drafting (11.5)	Post Trial Brief	108	1242
P. Birk	4/4/23	1	1	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	108
P. Birk	4/5/23	0.5	0.5	Calling CB's mom and emailing DC with an update	Client Communications - Relative	108	54
P. Birk	4/5/23	2	2	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	216
P. Birk	4/6/23	0.5	0.5	Scanning and saving new prison letters	Inmate Letters	108	54
P. Birk	4/6/23	4.5	4.5	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	486
P. Birk	4/11/23	1	1	Looking up Webster Parish Clerk of Court info (brief aside to research whether the Clerk is related to Jonathan Vining), calling Clerk's office re: requesting documents from Hayden proceedings, and emailing DC to update	Legal Research	108	108
P. Birk	4/11/23	2	2	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	216
P. Birk	4/18/23	7.5	7.5	Proofreading, line-editing, and seeking citations for reply to defendants' post-trial brief (7.5)	Post Trial Brief	108	810
P. Birk	4/21/23	3	3	Proofreading, line-editing, and seeking citations for reply to Defendants' post-trial brief	Post Trial Brief	108	324
P. Birk	4/21/23	0.5	0.5	Calling Walgreens and FedEx to determine time for pickup at different locations	Case Management	108	54
P. Birk	4/22/23	1	1	Printing brief, prepping for FedEx, traveling to FedEx, sending brief, traveling back from FedEx, and scanning receipts (1.0)	Case Management	108	108
P. Birk	4/24/23	4	4	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	432
P. Birk	4/26/23	5	5	Reviewing, memo'ing, and drafting responses to backlogged letters (5.0)	Inmate Response Letters	108	540
P. Birk	4/27/23	6	6	Updating oldest drafted letter responses, adding new information, noting requested enclosures, and prepping and saving response letter templates	Inmate Response Letters	108	648
P. Birk	4/28/23	0.5	0.5	Scanning newly-received letters	Inmate Letters	108	54
P. Birk	4/28/23	0.5	0.5	Preparing envelopes with ink stamps	Mass Mailing	108	54
P. Birk	4/28/23	1	1	Folding letters, stuffing and sealing envelopes	Mass Mailing	108	108
P. Birk	5/1/23	0.5	0.5	Reading sur-reply	Sur-Reply	108	54
P. Birk	5/2/23	2	2	Reviewing, memo'ing, and drafting responses to backlogged letters	Inmate Response Letters	108	216
P. Birk	5/4/23	0.5	0.5	Generating and naming response letter templates	Inmate Response Letters	108	54
P. Birk	5/4/23	0.5	0.5	Prepping recipient list and formatting to match labels	Mass Mailing	108	54
P. Birk	5/4/23	0.5	0.5	Comparing items in sur-reply to our reply brief	Sur-Reply	108	54
P. Birk	5/5/23	0.5	0.5	Ink-stamping envelopes	Mass Mailing	108	54
P. Birk	5/5/23	0.5	0.5	Moving files out of intake box and into individual folders, creating new folders for new writers	Intake Letters	108	54
P. Birk	5/10/23	1	1	Reviewing, memo'ing, and drafting responses to backlogged letters (1.0)	Inmate Response Letters	108	108
P. Birk	5/12/23	2	2	Reviewing, memo'ing, and drafting responses to backlogged letters (2.0)	Inmate Response Letters	108	216
P. Birk	5/15/23	0.5	0.5	Looking at Webster Parish online resources trying to determine whether Steve has been arraigned	Case Management	108	54
P. Birk	5/15/23	3	3	Reviewing, memo'ing, and drafting responses to letters	Inmate Response Letters	108	324
P. Birk	5/17/23	1	1	Prepping outgoing letter templates and checking locations on VineLink	Client Communications	108	108
P. Birk	5/18/23	0.5	0.5	Reading and responding to DWCC family member email	Client Communications - Relative	108	54
P. Birk	5/22/23	3	3	Reviewing, memo'ing, and drafting responses to letters	Inmate Response Letters	108	324
P. Birk	5/23/23	0.5	0.5	Calling RLCC (including hold time) to confirm recently sent letters	Client Communications	108	54
P. Birk	5/23/23	0.5	0.5	Memo'ing recent call from out of custody caller	Client Communications	108	54
P. Birk	5/23/23	0.5	0.5	Downloading and consolidating DWCC family member emails, responding to latest email	Client Communications - Relative	108	54
P. Birk	5/25/23	0.5	0.5	Fixing mailing label for response letter and preparing for mailing, scanning, and handing over to Front Desk	Inmate Response Letters	108	54
P. Birk	5/31/23	0.5	0.5	Generating and saving memo templates; naming scanned letters	Inmate Letters	108	54
P. Birk	5/31/23	0.5	0.5	Scanning new letters and combining large attachment scan to bulky letter	Inmate Letters	108	54
P. Birk	6/6/23	2	2	Reviewing, memo'ing, and drafting responses to letters (2.0)	Inmate Response Letters	108	216
P. Birk	6/12/23	0.5	0.5	Scanning new letters	Inmate Letters	108	54
P. Birk	6/13/23	0.5	0.5	Moving letters and memos out of weekly intake folder and into individual dropbox folders; generating new individual folders where needed	Intake Letters	108	54
P. Birk	6/14/23	1	1	Reviewing "Louisiana Deaths Behind Bars" study circulated by SK	Case Management	108	108
P. Birk	6/14/23	1	1	Memo'ing Mr. E second letter from jail, reviewing last letter, and drafting response	Inmate Response Letters	108	108

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
P. Birk	6/14/23	0.5	0.5	Reviewing, memo'ing, and drafting responses to letters	Inmate Response Letters	108	54
P. Birk	6/14/23	0.5	0.5	Printing Mr. E response letter, prepping envelope, and delivering to Front Desk for mailing	Inmate Response Letters	108	54
P. Birk	6/21/23	0.5	0.5	Opening, scanning, and saving newly-received letters and adding to DropBox	Inmate Letters	108	54
P. Birk	6/21/23	1	1	Reviewing, memo'ing, and drafting responses to letters	Inmate Response Letters	108	108
P. Birk	6/21/23	0.5	0.5	Looking through dropbox and checking recent letters for writers who may be able to provide statements if needed	Client Communications	108	54
P. Birk	6/22/23	0.5	0.5	Discussing DWCC family caller with GVW, DC, and MB	Client Communications - Relative	108	54
P. Birk	6/22/23	0.5	0.5	Reviewing scans of sent response letters and compiling a list of DWCC writers since February	Inmate Response Letters	108	54
P. Birk	6/23/23	1	1	Reading recent filings	Case Management	108	108
P. Birk	6/23/23	4.5	4.5	Reviewing memos and letters since February, taking notes, and determining potential candidates for affidavits if needed	Client Communications	108	486
P. Birk	6/27/23	1	1	Reading new email from inmate family member, reviewing past correspondence with same, checking info on DoC website, drafting and sending email response	Client Communications - Relative	108	108
P. Birk	6/28/23	1	1	Call with mother of Allen inmate	Client Communications - Relative	108	108
P. Birk	6/29/23	0.5	0.5	Memo'ing emails from RK's sister	Client Communications - Relative	108	54
P. Birk	7/3/23	0.5	0.5	Memoing EHCC family emails	Client Communications - Relative	108	54
P. Birk	7/3/23	0.5	0.5	Moving call and email memos from last few weeks into individual folders on DropBox; generating new folders where needed	Client Communications	108	54
P. Birk	7/3/23	0.5	0.5	Reading opposition filing	Case Management	108	54
P. Birk	7/5/23	0.5	0.5	Generating and saving outgoing letter templates	Client Communications	108	54
P. Birk	7/5/23	1	1	Printing labels and letters, adding ink and postage stamps to envelopes, stuffing and sealing envelopes, scanning and delivering to front office for mailing	Mass Mailing	108	108
P. Birk	7/6/23	0.5	0.5	Moving files out of weekly intake folder and into individual folders for folks who were sent responses this week; generating new individual folders where needed	Intake Letters	108	54
P. Birk	7/6/23	0.5	0.5	Calling Webster Parish Clerk's office, including hold time, to pay invoice for requested Hayden records	Public Record Requests	108	54
P. Birk	7/6/23	0.5	0.5	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Intake Letters	108	54
P. Birk	7/10/23	0.5	0.5	Reading def's reply to response to motion to admit new evidence	Motion to Reopen the Record	108	54
P. Birk	7/13/23	3	3	Reviewing, memo'ing, and drafting responses to letters (including one writer who sent 150 pages of documentation) (3.0)	Inmate Response Letters	108	324
P. Birk	7/14/23	0.5	0.5	Prepping response templates, printing letters and labels, ink and postage stamping envelopes, stuff/seal/scan envelopes and deliver to front desk for mailing	Inmate Response Letters	108	54
P. Birk	7/14/23	1	1	Memo'ing recent inmate and family calls	Client Communications - Relative	108	108
P. Birk	7/20/23	0.5	0.5	Moving files out of weekly intake folder and into individual folders for writers who were sent responses this week; generating new folders where needed; breaking out documents	Client Intake	108	54
P. Birk	8/1/23	3.5	3.5	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.5)	Client Intake	108	378
P. Birk	8/2/23	0.5	0.5	Memo'ing Haulsey call on DWCC call tracking sheet and emailing team with update	Case Management	108	54
P. Birk	8/3/23	0.5	0.5	Returning voicemail from DWCC family member caller; checking records to determine past correspondence	Client Communications - Relative	108	54
P. Birk	8/4/23	0.5	0.5	Scanning and saving new letters; reviewing most recent letter from Mr. K at LSP	Inmate Letters	108	54
P. Birk	8/4/23	0.5	0.5	Organizing files in DropBox and checking on overall letter intake to determine if we're not getting as many letters from DWCC as usual	Client Intake	108	54
P. Birk	8/4/23	0.5	0.5	Discussing case with SZ and new FAIR case manager	Case Management	108	54
P. Birk	8/4/23	0.5	0.5	Gathering folders and old labels to reuse for updating and organizing DWCC files in closet	Case Management - Document Management	108	54
P. Birk	8/7/23	0.5	0.5	Reviewing letter from Ms. Knockum and updating team	Client Communications	108	54
P. Birk	8/7/23	1	1	Reviewing past correspondence with Ms. Knockum, drafting email response to intake letter, re-reading and considering language to ensure proper response	Intake Letters	108	108
P. Birk	8/8/23	1	1	Printing letters and attachments, printing stamps and labels, adding labels / postage stamps/ ink stamps to envelopes, requesting larger mailing label for bulky letter, prepping and scanning envelopes, and delivering to front desk for mailing	Mass Mailing	108	108
P. Birk	8/9/23	0.5	0.5	Checking past files to determine whether we've had any past correspondence with caller who reached out through fundraising email	Case Management	108	54
P. Birk	8/14/23	3.5	3.5	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.5)	Client Intake	108	378
P. Birk	8/15/23	0.5	0.5	Memo'ing recent call with DWCC mother	Client Communications - Relative	108	54
P. Birk	8/16/23	1	1	Prepping outgoing response letter templates, printing letters and labels, adding postage and ink stamps to envelopes, stuffing/sealing envelopes, scanning outgoing envelopes and delivering to Front Desk for mailing (1.0)	Inmate Response Letters	108	108
P. Birk	8/18/23	0.5	0.5	Scanning and saving new letter; searching through records to determine whether we have interacted with writer before; emailing MB to determine best way to process new letter (.5)	Inmate Letters	108	54
P. Birk	8/24/23	0.5	0.5	Memo'ing DWCC sister call from 8/22	Client Communications - Relative	108	54
P. Birk	8/24/23	0.5	0.5	Moving letters and memos out of weekly intake folder and into individual folders for folks who were sent responses last week; creating new folders where needed; moving family call memos into individual folders	Call Memo	108	54
P. Birk	8/28/23	0.5	0.5	Beginning to review and memo long letter from EC	Client Communications	108	54
P. Birk	8/31/23	0.5	0.5	Reviewing past emails from WK and checking her brother's file in our records to determine which emails have already been memo'ed	Client Communications - Relative	108	54
P. Birk	9/7/23	0.5	0.5	Inspecting scans created at the end of day yesterday and combining scans of the letters with their corresponding envelopes	Mass Mailing	108	54
P. Birk	9/11/23	0.5	0.5	Generating and saving response letters to mail out tomorrow	Inmate Response Letters	108	54
P. Birk	9/12/23	0.5	0.5	Printing letters, stamps, and labels	Mass Mailing	108	54
P. Birk	9/12/23	0.5	0.5	Adding ink stamps, postage stamps, and labels to envelopes; stuffing and sealing envelopes; scanning envelopes and delivering to front desk for mailing	Mass Mailing	108	54
P. Birk	9/12/23	0.5	0.5	Scanning and saving new letters	Inmate Letters	108	54
P. Birk	9/12/23	1	1	Doing research re: DoC regulations regarding physical representations of Rastafarian religion; researching correct spelling of RLCC staff names; researching civil suit that was filed against RLCC earlier this year	Case Management	108	108

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
P. Birk	9/14/23	0.5	0.5	After review of one of the letters in the weekly intake folder, I spent some time online researching a couple of incidents at DWCC that were referenced by the writer	Intake Letters	108	54
P. Birk	9/14/23	0.5	0.5	Reviewing information in "Deaths Behind Bars" report from Loyola and on IncarcerationTransparency.org	Case Management	108	54
P. Birk	9/15/23	1	1	Preparing outgoing response letter templates; printing responses and labels; adding labels, ink stamps, and postage stamps to envelopes; stuffing, scaling, and scanning envelopes; delivering to front desk for mailing	Inmate Response Letters	108	108
P. Birk	9/18/23	0.5	0.5	Finalizing draft of global memo re: RLCC writers (.5)	Case Management	108	54
P. Birk	9/20/23	0.5	0.5	Call with CH's uncle; his phone charge was low and we did not finish the conversation, so he asked me to call back in a couple of hours; finishing taking notes from the conversation after we hung up the call	Client Communications - Relative	108	54
P. Birk	9/20/23	1	1	Continuing work on reorganizing files in DWCC closet	Case Management - Document Management	108	108
P. Birk	9/21/23	1	1	Typing up call memo from lengthy handwritten notes from two lengthy phone calls with DWCC uncle yesterday	Call Memo	108	108
P. Birk	9/21/23	0.5	0.5	Reviewing past correspondence with writer in Intake folder and updating spreadsheet of men we may want to call to include info about this writer	Client Intake	108	54
P. Birk	9/21/23	1	1	Reviewing, memo'ing, and drafting response to letter in weekly intake folder; double-checking timelines for ARP procedure; reviewing language used in last response letter to this writer; reviewing and revising response to stay mindful of limited literacy	Client Intake	108	108
P. Birk	9/22/23	0.5	0.5	Following up with Intake and Reception after speaking to the callers they sent to me this week	Client Intake	108	54
P. Birk	9/25/23	0.5	0.5	Performing a quick-review of letters that arrived at the end of last week and updating list of potential inmates to put on the call list for later this week	Client Communications	108	54
P. Birk	9/25/23	1	1	Memo'ing very long call with former DWCC inmate on Friday	Client Communications	108	108
P. Birk	10/2/23	1	1	Looking through letters from the last year to seek mentions of discipline for self-mutilation (1.0)	Client Communications	108	108
P. Birk	10/3/23	1	1	Continuing reviewing letters from the last year to seek mentions of discipline for self-mutilation (1.0)	Client Communications	108	108
P. Birk	10/3/23	1	1	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.0)	Client Intake	108	108
P. Birk	10/9/23	3.5	3.5	Continuing to review, memo, and draft responses later in the day (3.5)	Case Management	108	378
P. Birk	10/10/23	1	1	Generating memos of recent DWCC family member calls from handwritten call notes (1.0)	Client Communications - Relative	108	108
P. Birk	11/1/23	1	1	Began processing letters in weekly intake folder; spent some time researching potential referrals for mental health support systems for incarcerated and formerly incarcerated individuals; read scholarly article on National Library of Medicine website re: FIP mental health group that was started in New Orleans (1.0)	Intake Letters	108	108
P. Birk	11/2/23	0.5	0.5	Reviewing, memo'ing, and drafting responses to letter in weekly intake folder (.5)	Client Intake	108	54
P. Birk	11/3/23	0.5	0.5	Moving letters and memos for folks who were sent responses today out of weekly intake folder and into individual folders; generating new folders where needed; adding new writers to mass mailing list; re-numbering items remaining in weekly intake folder (.5)	Client Intake	108	54
P. Birk	11/13/23	1	1	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.0)	Client Intake	108	108
P. Birk	11/13/23	0.5	0.5	Looking up information that was requested by recent writer to see if I can find any guidance that would be appropriate to offer him (.5)	Case Management	108	54
P. Birk	11/14/23	0.5	0.5	Generating outgoing response letters from template; printing letters and labels; prepping envelopes; scanning envelopes and delivering to Front Desk to mail out tomorrow (.5)	Inmate Response Letters	108	54
P. Birk	11/15/23	1	1	Reviewing DWCC and DoC policies and drafting and sending guidance email to SPLC attorney who reached out to our team for advice (1.0)	Case Matters	108	108
P. Birk	12/6/23	2	2	Working on DWCC file organization in the closet pre-lunch	Case Management - Document Management	108	216
P. Birk	12/6/23	3	3	Working on DWCC file organization in the closet post-lunch	Case Management - Document Management	108	324
P. Birk	12/12/23	2	2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	216
P. Birk	12/26/23	5.5	5.5	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	594
P. Birk	12/26/23	1	1	Continuing to ink stamp envelopes in preparation for mass mailing	Mass Mailing	108	108
P. Birk	12/27/23	0.5	0.5	Beginning to prepare response letters to mail out tomorrow two of the responses will have to be updated due to new letters from those writers arriving today]	Inmate Response Letters	108	54
P. Birk	12/27/23	0.5	0.5	Gathering envelopes, printing stamps, reviewing past correspondence from one of the writers whose letter came today	Mass Mailing	108	54
P. Birk	12/28/23	1	1	Generating outgoing response letters from template; updating responses for two writers whose supplemental letters arrived yesterday; printing labels and letters; prepping envelopes; scanning envelopes; discussing with colleagues options for dropping letters at USPS since the receptionist is out	Inmate Response Letters	108	108
P. Birk	1/5/24	1	1	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	108
P. Birk	1/12/24	0.5	0.5	Moving items out of weekly intake folder and into individual folders for folks being sent responses; generating new folders where needed; adjusting leading numbers on document titles in weekly intake folder	Client Intake	108	54
P. Birk	1/17/24	2	2	Continuing to work on organizing the DWCC files closet, including searching for more folders and hanging files	Case Management - Document Management	108	216
P. Birk	1/18/24	1	1	Continuing work on updating mass mailing list with current	Mass Mailing	108	108
P. Birk	1/18/24	0.5	0.5	Reviewing, memo'ing, and drafting response to letter in weekly intake folder	Client Intake	108	54
P. Birk	2/2/24	0.5	0.5	Discussing prison letters with Ms. VanWart; typing and sending language sample to assist her in providing ARP guidance to recent writers	Inmate Letters	108	54
P. Birk	2/2/24	0.5	0.5	Locating large envelopes with no metal brads and delivering to Ms. VanWart for her letters; gathering a few more sheets for printing stamps in preparation for the upcoming mass mailing; discussing stamps and mass mail procedures with Ms. Taylor	Mass Mailing	108	54
P. Birk	2/2/24	0.5	0.5	Printing 23 sheets of stamps from Endicia in anticipation of upcoming mass mailing	Mass Mailing	108	54
P. Birk	2/2/24	0.5	0.5	Organizing physical letters in personal office and moving some to DWCC files closet; assessing need for more folders	Client Communications	108	54

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
P. Birk	2/5/24	0.5	0.5	Reading over draft of mass mailing letter; comparing to previous update letters; providing minor syntactical suggestions	Mass Mailing	108	54
P. Birk	2/8/24	3	3	Finishing preparing envelopes for mass mailing (3.0)	Mass Mailing	108	324
P. Birk	2/10/24	1	1	Beginning process of folding letters and stuffing envelopes (1.0)	Mass Mailing	108	108
P. Birk	2/11/24	6	6	Continuing process of folding letters and stuffing envelopes	Mass Mailing	108	648
P. Birk	2/14/24	2	2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Client Intake	108	216
P. Birk	2/20/24	2	2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	216
P. Birk	2/21/24	0.5	0.5	Reading over call notes from DWCC attorney calls yesterday	Case Management	108	54
P. Birk	2/27/24	0.5	0.5	Reading over past correspondence with Mr. Samuels; returning call to Mr. Samuels's mother in response to her voicemail	Client Communications - Relative	108	54
P. Birk	2/28/24	0.5	0.5	Calling Mr. Moore to return his voicemail from last week; general conversation about the state of the case as well as his experiences at DWCC and how things are going for him now	Client Communications	108	54
P. Birk	3/5/24	0.5	0.5	Creating new labels for re-sending returned letters; generating cover letters	Inmate Letters	108	54
P. Birk	3/9/24	0.5	0.5	Generating memo on recent call with Mr. Moore from handwritten call notes (.5)	Case Management	108	54
P. Birk	3/11/24	0.5	0.5	Virtual meeting with Ms. Bray and Mr. Courson to discuss plan for DWCC monitoring visit	Case Management	108	54
P. Birk	3/12/24	4	4	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	432
P. Birk	3/12/24	1	1	Generating outgoing response letters from template; generating labels for outgoing letters; verifying locations on VineLink	Inmate Response Letters	108	108
P. Birk	4/3/24	3	3	Performing two close proofreads of memo in opposition; making grammatical / spelling edits; cite-checking; adding missing cites; etc. (3.0)	Case Management	108	324
P. Birk	4/5/24	0.5	0.5	Drafting and printing cover letter for sending ARP info to Mr. Ethridge's loved one; printing letter and materials, prepping envelope and label request, and delivering to Front Desk for mailing	Client Communications - Relative	108	54
P. Birk	4/16/24	0.5	0.5	Generating cover letters for resending returned letters; generating and printing labels; prepping envelopes, scanning, and delivering to front desk for mailing; updating locations on mass mail list	Mass Mailing	108	54
P. Birk	5/14/24	2	2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	216
P. Birk	5/15/24	0.5	0.5	Moving items out of weekly intake folder and into individual folders; generating new folders where needed	Client Intake	108	54
P. Birk	5/24/24	0.5	0.5	Drafting cover letter for sending liability decision to Mr. P.N; printing letter and decision; prepping envelope; delivering to front desk to request big label and hopeful mailing today	Client Communications	108	54
P. Birk	5/29/24	0.5	0.5	Generating cover letters for re-sending letters that were returned; printing cover letters and labels; prepping envelopes; scanning and delivering to Front Desk for hopeful mailing today; updating housing locations on mass mailing spreadsheet	Mass Mailing	108	54
P. Birk	5/29/24	1	1	Attending webinar: Rights of Individuals with Disabilities Re-entering the Community after Incarceration	Case Management	108	108
P. Birk	5/30/24	1	1	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	108
P. Birk	6/4/24	0.5	0.5	Scanning and saving letter returned to us as undeliverable; checking file to review our past correspondence with the writer; generating cover sheet for re-sending and prepping new envelope to mail out tomorrow	Mass Mailing	108	54
P. Birk	6/4/24	0.5	0.5	Researching online to try to find appropriate medical malpractice attorney referrals to offer to Mr. Anthony's father	Case Management	108	54
P. Birk	6/18/24	0.5	0.5	Looking over DWCC call notes since the beginning of the year; checking some gentlemen's current housing locations and previous correspondence with our agency; trying to determine whom to schedule calls with this week	Case Management	108	54
P. Birk	6/24/24	2	2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	216
P. Birk	6/28/24	0.5	0.5	Printing letters and labels; prepping envelopes to go out; verifying on vinelink that locations haven't changed; scanning outgoing envelopes; delivering to Front Desk for mailing today	Mass Mailing	108	54
P. Birk	7/1/24	0.5	0.5	Updating drafted ARP / Sick Call / Accommodations resource documents and emailing back to Ms. Bray with my corrections	Case Management	108	54
P. Birk	7/2/24	2	2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder	Client Intake	108	216
P. Birk	7/2/24	0.5	0.5	Generating outgoing response letters from template; printing letters and labels; locating and printing enclosures; prepping envelopes; scanning envelopes; delivering to Front Desk for mailing tomorrow	Inmate Response Letters	108	54
P. Birk	7/10/24	0.5	0.5	Phone call with Mr. Newton obo his son at DWCC (.5)	Client Communications - Relative	108	54
P. Birk	7/19/24	2	2	Closely reading over Judge Foote's Remedial Order issued today; taking notes in preparation of drafting mass mailing update letter (2.0)	Court Order	108	216
P. Birk	7/21/24	0.5	0.5	Sourcing and counting envelopes for upcoming mass mailing; inventorying labels and stamps (.5)	Mass Mailing	108	54
P. Birk	7/22/24	1	1	Generating list of men I believe should be sent the Remedy phase decision in full; looking up current housing locations online; reviewing previous correspondence and memos to determine if we have contact information for those that could not be located in VineLink; additional research online to determine if I could find them	Intake Letters	108	108
P. Birk	8/5/24	2	2	Reviewing entries on Mr. Courson's DWCC time sheet to identify items that will require redaction as well as other inappropriate entries	Time Sheets	108	216
P. Birk	8/7/24	1	1	Working on timesheets for work done on the case by Mr. Lospennato, to identify items that may be privileged and require redaction and to identify duplicate entries	Bill of Costs	108	108
P. Birk	8/8/24	0.5	0.5	Meeting with Ms. Bray and Mr. Courson to discuss to-do list, assignments, and status of monitor search	Motion for Bill of Costs	108	54
P. Birk	8/12/24	1	1	Reviewing time sheets for Ms. Bray's work on the case to identify and remove privileged information, fix typos, adjust time for clerical tasks, and remove duplicate entries (9:00am- 10:00am)	Motion for Attorney Fees	108	108
P. Birk	8/12/24	3	3	Continuing reviewing time sheets for Ms. Bray's work on the case (11:00am-2:00pm)	Motion for Attorney Fees	108	324
P. Birk	8/13/24	2	2	Continuing work on Ms. Bray's time sheets after work hours	Motion for Attorney Fees	108	216
P. Birk	8/14/24	1	1	Continuing to work through Ms. Bray's time sheets between morning meetings	Motion for Attorney Fees	108	108
Dalton Courson	6/13/22	2	2	Reviewing case record and other materials in case file	Case Management	400	800
Dalton Courson	6/14/22	3	3	Reviewing discovery documents and ECF file	Discovery	400	1200

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Dalton Courson	6/15/22	7	7	Reviewing documents produced by Defendants in response to request RFP for production 13R and preparing spreadsheet regarding same		400	2800
Dalton Courson	6/16/22	2	2	Meeting with Ms. Bray and Ms. Schwartzmann	Call/Discussion - Co-Counsel	400	800
Dalton Courson	6/17/22	0.5	0.5	Conducted legal research to support reply memorandum in support of motion	Legal Research	400	200
Dalton Courson	6/17/22	1	1	Drafted insert to reply memorandum in support of motion for leave to conduct	Motion for Leave	400	400
Dalton Courson	6/17/22	1	1	Drafted Rule 30(b)(6) notice of deposition of DWCC	Deposition - Preparation	400	400
Dalton Courson	6/17/22	0.5	0.5	Drafted letter to opposing counsel regarding supplementation of initial	Case Management	400	200
Dalton Courson	6/21/22	0.5	0.5	Drafted response to email from opposing counsel regarding experts	MISO Motion for Entry	400	200
Dalton Courson	6/21/22	1	1	Reviewing email correspondence with opposing counsel regarding Rule 26 disclosures- and reviewing rules and case law regarding same	Discovery	400	400
Dalton Courson	6/21/22	2	2	Reviewing transcript of Phase 1 trial	Post Trial Brief	400	800
Dalton Courson	6/22/22	3.5	3.5	Drafted memorandum in support of motion for entry of order regarding protocol for expert site visit	MISO Motion for Entry	400	1400
Dalton Courson	6/22/22	1	1	Drafted response to email from opposing counsel regarding protocol for site	MISO Motion for Entry	400	400
Dalton Courson	6/22/22	1	1	Researched Judge Foote's prior rulings regarding appeals from magistrate judge decision (1.0);	Legal Research	400	400
Dalton Courson	6/22/22	0.5	0.5	drafted email to co-counsel (0.5)	Case Management	400	200
Dalton Courson	6/23/22	3.5	3.5	Revised memorandum in support of motion for order regarding protocols for expert visits; gathered exhibits for same	MISO Motion for Entry	400	1400
Dalton Courson	6/23/22	1	1	Weekly meeting to discuss strategy	Case Management - Team Meeting	400	400
Dalton Courson	6/27/22	10	10	Site visit with experts (including travel from Ruston to David Wade)	DWCC Visits	400	4000
Dalton Courson	6/28/22	10	10	Site visit with experts (including travel from Ruston to David Wade)	DWCC Visits	400	4000
Dalton Courson	6/28/22	1	1	Reviewing documents in connection with site visit	DWCC Visits - Preparation	400	400
Dalton Courson	6/29/22	9	9	Site visit with experts (including travel from Ruston to David Wade)	DWCC Visits	400	3600
Dalton Courson	6/30/22	10	10	Client interviews at David Wade (including travel from Ruston to David Wade)	DWCC Visits	400	4000
Dalton Courson	7/1/22	6	6	Return travel from Ruston to New Orleans from David Wade site visit	DWCC Visits	400	2400
Dalton Courson	7/4/22	3.5	3.5	Drafting and editing appeal from magistrate judge ruling	Appeal - Magistrate	400	1400
Dalton Courson	7/5/22	5	5	Revised appeal from magistrate judge ruling	Appeal - Magistrate	400	2000
Dalton Courson	7/5/22	0.5	0.5	Meeting with co-counsel to discuss potential stipulations and depositions	Deposition	400	200
Dalton Courson	7/6/22	3	3	Drafted objections to Notice of Deposition to DRLA	Deposition	400	1200
Dalton Courson	7/7/22	1	1	Reviewed Defendants' Motion for Protective Order and drafted outline for argument in opposition	Motion for Protective Order	400	400
Dalton Courson	7/7/22	3.5	3.5	Reviewing trial and deposition transcripts in order to prepare for upcoming depositions	Deposition - Preparation	400	1400
Dalton Courson	7/7/22	0.5	0.5	Drafting memoranda regarding site visit to DWCC	DWCC Visit Memos	400	200
Dalton Courson	7/8/22	3	3	Drafting Memorandum in Opposition to Defendants' Motion for Protective Order	Motion for Protective Order	400	1200
Dalton Courson	7/9/22	1	1	revised memorandum	Motion for Protective Order	400	400
Dalton Courson	7/12/22	1	1	Multiple discovery conferences with opposing counsel regarding DRLA Rule 30(b)(6)	Discovery	400	400
Dalton Courson	7/12/22	1	1	Reviewing case file regarding earlier rulings regarding 30(b)(6) issues	30(b)(6) Deposition	400	400
Dalton Courson	7/12/22	2	2	Drafting letter to opposing counsel regarding motion for protective order	Motion for Protective Order	400	800
Dalton Courson	7/13/22	0.5	0.5	Meeting with Ms. Bray to discuss discovery and depositions	Discovery	400	200
Dalton Courson	7/13/22	0.5	0.5	Edited letter to opposing counsel regarding Rule 30(b)(6) deposition of DRLA	Deposition - Preparation	400	200
Dalton Courson	7/14/22	3.5	3.5	Revised letter to opposing counsel regarding objection to Rule 30(b)(6) deposition of DRLA	Deposition - Preparation	400	1400
Dalton Courson	7/14/22	0.5	0.5	Legal research regarding Rule 31	Legal Research	400	200
Dalton Courson	7/17/22	9	9	Drafting memorandum in support of motion for protective order	Motion for Protective Order	400	3600
Dalton Courson	7/18/22	7	7	Revising memorandum in support of motion for protective order, including revamping introduction and performing check of citations	Motion for Protective Order	400	2800
Dalton Courson	7/18/22	0.5	0.5	drafted cover motion	Motion for Protective Order	400	200
Dalton Courson	7/18/22	0.5	0.5	drafted declaration for Ms. Bray	Motion for Protective Order	400	200
Dalton Courson	7/18/22	0.5	0.5	prepared exhibits	Trial Exhibits	400	200
Dalton Courson	7/20/22	1	1	Legal research regarding cases cited in Defendants' memorandum in opposition to motion for protective order	Motion for Protective Order	400	400
Dalton Courson	7/22/22	2	2	Drafting memoranda regarding site visit	DWCC Visit Memos	400	800
Dalton Courson	7/26/22	4.5	4.5	Reviewing trial and deposition transcripts to prepare for upcoming depositions	Deposition - Preparation	400	1800
Dalton Courson	7/27/22	6	6	Preparing for depositions	Deposition - Preparation	400	2400
Dalton Courson	7/28/22	1	1	Weekly David Wade meeting	Case Management - Team Meeting	400	400
Dalton Courson	7/28/22	6	6	reviewing documents in preparation for depositions and drafting outline	Deposition - Preparation	400	2400
Dalton Courson	7/29/22	4.5	4.5	Preparing for upcoming depositions	Deposition - Preparation	400	1800
Dalton Courson	7/29/22	2	2	drafting reply memorandum in support of appeal	Appeal - Magistrate	400	800
Dalton Courson	7/30/22	4.5	4.5	Preparing for depositions	Deposition - Preparation	400	1800
Dalton Courson	7/31/22	1	1	Finalized and electronically filed reply memorandum regarding appeal	Appeal - Magistrate	400	400
Dalton Courson	7/31/22	6	6	travel to Ruston	DWCC Visits	400	2400
Dalton Courson	7/31/22	3	3	preparing for depositions	Deposition - Preparation	400	1200
Dalton Courson	8/1/22	2	2	Travel to and from David Wade	DWCC Visits	400	800
Dalton Courson	8/1/22	4	4	participating in depositions	Deposition	400	1600
Dalton Courson	8/1/22	5.5	5.5	preparing for upcoming depositions	Deposition - Preparation	400	2200
Dalton Courson	8/2/22	2	2	Travel to and from David Wade	DWCC Visits	400	800
Dalton Courson	8/2/22	4	4	attending depositions at David Wade	Deposition	400	1600
Dalton Courson	8/3/22	2	2	Travel to and from David Wade	DWCC Visits	400	800
Dalton Courson	8/3/22	2	2	Participating in deposition of Steve Hayden	Deposition	400	800
Dalton Courson	8/3/22	4	4	Preparing for depositions of Ryan Kimball and Lonnie Nail	Deposition - Preparation	400	1600
Dalton Courson	8/4/22	1	1	Travel to David Wade	DWCC Visits	400	400
Dalton Courson	8/4/22	4.5	4.5	taking depositions of Ryan Kimball and Lonnie Nail	Deposition	400	1800
Dalton Courson	8/4/22	6	6	return to New Orleans	DWCC Visits	400	2400
Dalton Courson	8/6/22	0.5	0.5	Reviewed outline for deposition of Dr. Seal and responded to Ms. Bray regarding same	Deposition	400	200
Dalton Courson	8/6/22	2	2	drafting memorandum in support of appeal from magistrate judge's decision regarding Rule 30(b)(6) deposition of DRLA	Deposition	400	800
Dalton Courson	8/7/22	4	4	drafting deposition outlines for Natalie LaBorde and Blake LeBlanc	Deposition	400	1600
Dalton Courson	8/8/22	8	8	preparing for depositions of Blake LeBlanc and Natalie LaBorde	Deposition - Preparation	400	3200
Dalton Courson	8/9/22	2	2	Travel to Baton Rouge and back for depositions	Travel	400	800
Dalton Courson	8/9/22	3.5	3.5	took depositions of Natalie LaBorde and Blake LeBlanc	Deposition	400	1400
Dalton Courson	8/9/22	8.5	8.5	preparing for depositions of James LeBlanc and Seth Smith	Deposition - Preparation	400	3400

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Dalton Courson	8/10/22	2	2	Travel to Baton Rouge for depositions of Seth Smith and James LeBlanc	Travel	400	800
Dalton Courson	8/13/22	8.5	8.5	Preparing for depositions of David Wade security personnel	Deposition - Preparation	400	3400
Dalton Courson	8/14/22	5.5	5.5	Travel to Ruston (5.5); preparing for depositions (3.0)	Time Entry Issue	400	2200
Dalton Courson	8/15/22	8	8	Travel to and from David Wade; taking depositions of Col. Coleman and Warden Mays	Deposition	400	3200
Dalton Courson	8/16/22	3	3	Attended deposition of pill call officers	Pill Call	400	1200
Dalton Courson	8/16/22	2	2	travel to and from David Wade for same	DWCC Visits	400	800
Dalton Courson	8/16/22	3	3	preparing for deposition of Warden Sherman	Deposition - Preparation	400	1200
Dalton Courson	8/17/22	4.5	4.5	Attended deposition of Warden Dauzat and took deposition of Warden Sherman	Deposition	400	1800
Dalton Courson	8/17/22	2	2	travel to and from David Wade	DWCC Visits	400	800
Dalton Courson	8/17/22	1	1	preparing for deposition for Warden Goodwin	Deposition - Preparation	400	400
Dalton Courson	8/18/22	5.5	5.5	Return travel from Ruston for depositions	DWCC Visits	400	2200
Dalton Courson	9/2/22	2	2	drafting reply memorandum in support of appeal	Appeal - Magistrate	400	800
Dalton Courson	9/12/22	1	1	Edited motion for status conference and corresponded with co-counsel regarding same; reviewed Judge's Foote's requirements for pretrial order	Motion for Status Conference	400	400
Dalton Courson	9/15/22	5	5	Travel to Angola to interview class member	Inmate Interview	400	2000
Dalton Courson	9/16/22	0.5	0.5	Review of court's ruling on appeal of magistrate judge's ruling on Rule 12(b)(6) motion (0.5);	Appeal - Magistrate	400	200
Dalton Courson	9/19/22	0.5	0.5	Legal research regarding Rule 30(b)(6)	30(b)(6) Deposition	400	200
Dalton Courson	9/20/22	1	1	Preparing for status conference with the court, including conferring with Ms. Bray regarding same	Status Conference	400	400
Dalton Courson	9/28/22	1	1	legal research regarding timing for submission of motion for attorney fees (in light of court's 9/20 minute entry)	Motion for Attorney Fees	400	400
Dalton Courson	10/4/22	1	1	Drafting interrogatories and requests for production of documents	Discovery	400	400
Dalton Courson	10/6/22	1	1	Participated in weekly meeting	Case Management - Team Meeting	400	400
Dalton Courson	10/20/22	4	4	Meeting with clients via Zoom	Client Meetings	400	1600
Dalton Courson	10/21/22	3	3	Drafting spreadsheet with analysis of trial court's preliminary ruling	Preliminary Injunction	400	1200
Dalton Courson	11/1/22	2	2	Drafting response to Keith Fernandez re Rule 30(b)(6) deposition and researching same	30(b)(6) Deposition	400	800
Dalton Courson	11/3/22	1	1	Weekly meeting	Case Management - Team Meeting	400	400
Dalton Courson	11/8/22	3	3	Preparing for and participating in Deposition Preparation session with Mr. Lospennato and Ms. Bray	Deposition - Preparation	400	1200
Dalton Courson	11/10/22	1	1	Participated in weekly meeting	Case Management - Team Meeting	400	400
Dalton Courson	11/11/22	1	1	Reviewing defendant's expert reports for Remedy Phase	Working with Experts	400	400
Dalton Courson	11/15/22	6.5	6.5	Defended deposition of DRLA	Deposition	400	2600
Dalton Courson	11/15/22	0.5	0.5	conferred with cocounsel following deposition	Deposition	400	200
Dalton Courson	11/15/22	0.5	0.5	reviewing defendants' expert reports	Working with Experts	400	200
Dalton Courson	11/26/22	0.5	0.5	reviewing Upchurch report	Working with Experts	400	200
Dalton Courson	11/26/22	0.5	0.5	reviewed Dr. Burns's report	Working with Experts	400	200
Dalton Courson	11/27/22	0.5	0.5	Reviewing Craig Haney expert report	Working with Experts	400	200
Dalton Courson	11/27/22	0.5	0.5	reviewing Dr. Burns expert report	Working with Experts	400	200
Dalton Courson	11/27/22	3	3	providing comments to Dan Pacholke regarding his expert report and reviewing same	Working with Experts	400	1200
Dalton Courson	11/27/22	3.5	3.5	reviewing policy documents produced in discovery and adding citations to Bates-labelled documents in expert report	Working with Experts	400	1400
Dalton Courson	11/30/22	0.5	0.5	Reviewing drafts of expert reports	Working with Experts	400	200
Dalton Courson	11/30/22	2	2	began drafting proposed findings of fact	FFCL	400	800
Dalton Courson	12/1/22	1	1	Participated in weekly team meeting	Case Management - Team Meeting	400	400
Dalton Courson	12/6/22	3.5	3.5	Drafting memoranda in opposition to motion in limine	Motion in Limine	400	1400
Dalton Courson	12/9/22	8	8	Revised opposition memoranda to motions in limine	Motion in Limine	400	3200
Dalton Courson	12/9/22	0.5	0.5	prepared exhibits for same	Motion in Limine	400	200
Dalton Courson	12/9/22	0.5	0.5	e-filed same	Motion in Limine	400	200
Dalton Courson	12/10/22	7	7	Drafting outline for deposition of James Upchurch	Deposition	400	2800
Dalton Courson	12/11/22	6.5	6.5	Drafting inserts to pre-trial order	Pre-Trial Orders	400	2600
Dalton Courson	12/13/22	6	6	Taking deposition of James Upchurch	Deposition	400	2400
Dalton Courson	12/13/22	0.5	0.5	conferred with Mr. Pacholke and Ms. Bray regarding same	Vague	400	200
Dalton Courson	12/14/22	0.5	0.5	reviewing defendants' proposed pretrial inserts	Pre-Trial Orders	400	200
Dalton Courson	12/20/22	3	3	Drafted and revised correspondence to opposing counsel	Call/Email - Opposing Counsel	400	1200
Dalton Courson	12/21/22	0.5	0.5	conferred with Ms. Birk regarding preparations of potential summary or demonstrative exhibits	Case Management	400	200
Dalton Courson	12/21/22	0.5	0.5	reviewing past motions in limine	Motion in Limine	400	200
Dalton Courson	12/22/22	1	1	reviewing and commenting on defendants' proposed inserts to the pretrial order	Pre-Trial Orders	400	400
Dalton Courson	12/26/22	1	1	Working on demonstrative exhibits	Trial Preparation	400	400
Dalton Courson	12/28/22	4	4	Prepared for and participated in conference regarding pretrial order	Pre-Trial Orders	400	1600
Dalton Courson	12/28/22	1	1	began legal research regarding issues presented by motion in limine	Motion in Limine	400	400
Dalton Courson	12/29/22	3	3	Pulling documents produced in discovery to update summary chart on classification review decisions	Discovery	400	1200
Dalton Courson	12/30/22	4	4	Legal research and drafting for memorandum in opposition to motion in limine (4.0)	Motion in Limine	400	1600
Dalton Courson	12/31/22	4	4	Drafting memorandum in opposition to motion in limine	Motion in Limine	400	1600
Dalton Courson	1/1/23	1	1	reviewing deposition transcripts for trial designations	Deposition	400	400
Dalton Courson	1/2/23	0.5	0.5	conferred with Ms. Bray regarding trial strategy	Trial Preparation	400	200
Dalton Courson	1/3/23	4	4	Revising memorandum in opposition to motion in limine	Motion in Limine	400	1600
Dalton Courson	1/3/23	5	5	various matters in connection with preparation of joint pre-trial order, including review of exhibits and drafting objections, drafting inserts regarding applicable law, and reviewing changes submitted by opposing counsel	Joint Pre Trial Conference (JPTO)	400	2000
Dalton Courson	1/4/23	2	2	Finalizing Joint Pre-Trial Order and witness list	Witness List	400	800
Dalton Courson	1/7/23	1	1	Editing proposed findings of fact (1.0)	FFCL	400	400
Dalton Courson	1/8/23	3.5	3.5	Drafting objection to admission of Rule 30(b)(6) deposition	30(b)(6) Deposition	400	1400
Dalton Courson	1/9/23	2	2	Revising findings of fact and conclusions of law	FFCL	400	800
Dalton Courson	1/9/23	2	2	revised objection to admissibility of deposition	Deposition	400	800
Dalton Courson	1/9/23	0.5	0.5	began preparing witness examination for Dan Pacholke	Working with Experts	400	200
Dalton Courson	1/10/23	7	7	Meeting with Ms. Bray to plan trial and prepare for pretrial conference, including review of motions in limine and corresponding memoranda and drafted outline for oral argument regarding same	Trial Preparation	400	2800
Dalton Courson	1/11/23	3	3	Prepared for and participated in pretrial conference	Pre-Trial Conference	400	1200
Dalton Courson	1/12/23	9	9	Remedy Trial Preparations, including drafting witness outlines	Trial Preparation	400	3600
Dalton Courson	1/13/23	2	2	Travel to and visit to Adams and Reese to view trial site	Trial Preparation	400	800
Dalton Courson	1/13/23	6	6	Remedy Trial Preparations, including drafting witness outlines	Trial Preparation	400	2400
Dalton Courson	1/15/23	15	15	Drafting witness outlines and preparing for Remedy Phase trial	Trial Preparation	400	6000
Dalton Courson	1/16/23	16	16	Drafting witness outlines and preparing for first day of Remedy Phase trial	Trial Preparation	400	6400
Dalton Courson	1/17/23	15	15	Preparing for and attending first day of Remedy Trial (9.5); drafting witness outlines and preparing for next day of trial (6.5)	Time Entry Issue	400	6000
Dalton Courson	1/19/23	4	4	drafting witness outlines for upcoming witness	Working with Witnesses	400	1600

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Dalton Courson	1/22/23	6.5	6.5	Remedy Trial Preparations, including drafting witness outline for Blake LeBlanc and assisting Ms. Bray with review of exhibits	Trial Preparation	400	2600
Dalton Courson	1/23/23	5	5	drafting witness examination outlines and other Remedy Trial Preparations	Trial Preparation	400	2000
Dalton Courson	1/24/23	7	7	drafting witness examination outlines and other Remedy Trial Preparations	Trial Preparation	400	2800
Dalton Courson	1/25/23	3.5	3.5	drafting witness examination outlines and other Remedy Trial Preparations	Trial Preparation	400	1400
Dalton Courson	1/26/23	0.5	0.5	discussing trial strategy with co-counsel	Trial Preparation	400	200
Dalton Courson	1/27/23	6	6	Drafting cross-examination outline for James Upchurch	Trial Preparation	400	2400
Dalton Courson	1/28/23	6	6	Drafting cross-examination outlines for James Upchurch and Secretary James LeBlanc	Trial Preparation	400	2400
Dalton Courson	1/29/23	3.5	3.5	drafting crossexamination outline for Secretary LeBlanc	Trial Preparation	400	1400
Dalton Courson	1/29/23	0.5	0.5	revising outline for Mr. Upchurch	Trial Preparation	400	200
Dalton Courson	1/29/23	1	1	drafting potential cross examination questions for Warden Dauzat	Trial Preparation	400	400
Dalton Courson	1/30/23	4	4	preparing for examination of Secretary LeBlanc	Trial Preparation	400	1600
Dalton Courson	1/31/23	4	4	preparing for cross examination of Mr. Upchurch	Working with Witnesses	400	1600
Dalton Courson	2/1/23	1	1	preparing for upcoming witnesses	Working with Witnesses	400	400
Dalton Courson	2/5/23	0.5	0.5	conferred with Ms. Bray	Call/Discussion - Co-Counsel	400	200
Dalton Courson	2/10/23	0.5	0.5	Conferred with Ms. Bray and debriefed with Mr. Lospenato regarding trial	Post Trial	400	200
Dalton Courson	2/13/23	1	1	Prepared for deposition of Craig Haney, including meeting with Dr. Haney (1.0);	Deposition - Preparation	400	400
Dalton Courson	2/13/23	1	1	preparing for deposition of Dr. Thompson (1.0)	Deposition - Preparation	400	400
Dalton Courson	2/14/23	1	1	Prepared for and participated in deposition of Dr. Haney (1.0);	Deposition	400	400
Dalton Courson	2/15/23	6	6	Labeling and redacting plaintiff exhibits for submission to clerk of court	Trial Exhibits	400	2400
Dalton Courson	2/16/23	7	7	Redacting documents for submission of exhibits	Trial Exhibits	400	2800
Dalton Courson	2/21/23	2	2	Finalized and electronically filed plaintiff's exhibit list	Trial Exhibits	400	800
Dalton Courson	3/8/23	2	2	Drafting outline for post-trial memorandum	Post Trial	400	800
Dalton Courson	3/15/23	0.5	0.5	reviewing file materials for use in post-trial memorandum	Post Trial	400	200
Dalton Courson	3/20/23	0.5	0.5	drafting post-trial brief	Post Trial	400	200
Dalton Courson	3/21/23	1	1	Drafting post-trial brief	Post Trial	400	400
Dalton Courson	3/21/23	5	5	Continued drafting post-trial brief	Post Trial	400	2000
Dalton Courson	3/22/23	9	9	Drafting post-trial brief	Post Trial	400	3600
Dalton Courson	3/23/23	7	7	Drafting post-trial brief	Post Trial	400	2800
Dalton Courson	3/24/23	3	3	Drafting post-trial brief	Post Trial	400	1200
Dalton Courson	3/25/23	4	4	Drafting post-trial memorandum	Post Trial	400	1600
Dalton Courson	3/26/23	8	8	Drafting post-trial brief	Post Trial	400	3200
Dalton Courson	3/30/23	10	10	Drafting post-trial brief	Post Trial	400	4000
Dalton Courson	3/31/23	8	8	Finalized and e-filed post-trial brief	Post Trial	400	3200
Dalton Courson	4/15/23	6	6	Drafting post-trial reply brief	Post Trial	400	2400
Dalton Courson	4/16/23	7	7	Drafting post-trial reply brief	Post Trial	400	2800
Dalton Courson	4/17/23	5	5	Drafting reply brief	Post Trial	400	2000
Dalton Courson	4/18/23	6	6	Drafting post-trial reply brief	Post Trial	400	2400
Dalton Courson	4/19/23	2	2	Revising reply memorandum	Post Trial	400	800
Dalton Courson	4/20/23	0.5	0.5	Conferred with Ms. Bray regarding brief	Post Trial	400	200
Dalton Courson	4/21/23	4	4	Finalized and electronically filed post-trial reply memorandum	Post Trial	400	1600
Dalton Courson	4/28/23	0.5	0.5	Received phone call from opposing counsel regarding motion for leave to file sur-reply; conferred with Ms. Bray regarding same; drafted email responding to opposing counsel; reviewed sur-reply memorandum	Motion for Leave to File Sur-reply	400	200
Dalton Courson	6/16/23	0.5	0.5	Drafted email to Ms. Bray regarding Defendants' motion to supplement the record	Motion to Supplement	400	200
Dalton Courson	6/30/23	5	5	Revised memorandum in opposition to motion to supplement, including legal research for same	Motion to Supplement	400	2000
Dalton Courson	11/6/23	1	1	Researching options for monitor (1.0)	Case Management - Technology Issues	400	400
Dalton Courson	3/13/24	1	1	Reviewed DWCC motion to re-open trial record to introduce new evidence	Motion to Reopen the Record	400	400
Dalton Courson	3/15/24	1	1	Revised draft response to opposing counsel regarding P&A access authority and David Wade; reviewing settlement agreement	Block Billing	400	400
Dalton Courson	4/1/24	0.5	0.5	Participated in conference call with experts	Working with Experts	400	200
Dalton Courson	4/1/24	1	1	held call with Ms. Bray to discuss strategy for response to defendants' motion to reopen evidence	Motion to Reopen the Record	400	400
Dalton Courson	4/2/24	4.5	4.5	Revising memorandum in opposition to defendants' motion to reopen the case for introduction of new evidence	Motion to Reopen the Record	400	1800
Dalton Courson	4/10/24	0.5	0.5	Reviewing Defendants' reply brief in support of motion to reopen the record; conferred with Ms. Bray regarding same	Motion to Reopen the Record	400	200
Dalton Courson	4/16/24	2	2	Revising surreply memorandum	Sur-Reply	400	800
Dalton Courson	6/5/24	0.5	0.5	Revised memorandum in opposition to Defendants' motion for leave to supplement the record	Motion for Leave to Supplemental Affidavit	400	200
Dalton Courson	6/19/24	0.5	0.5	Writing up notes from my conversations with DWCC inmates on June 13	Case Management	400	200
Dalton Courson	7/19/24	2	2	researching PLRA issues	Case Management	400	800
Dalton Courson	7/19/24	1	1	confering with other DRLA staff regarding same	Case Management	400	400
Dalton Courson	7/23/24	4	4	Researching potential special masters; emails to two candidates	Selection of Special Master	400	1600
Dalton Courson	7/24/24	1	1	Researching potential candidates for special master	Selection of Special Master	400	400
Dalton Courson	7/24/24	0.5	0.5	and telephone call with PS	Case Management	400	200
Dalton Courson	8/6/24	4	4	reviewing Ms. Bray's timesheet for billing judgment and for privilege (4.0)	Time Sheets	400	1600
Dalton Courson	8/7/24	4	4	Reviewing Ms. Bray's timesheet for billing judgment and attorney/client privilege or work product	Motion for Bill of Costs	400	1600
Dalton Courson	8/7/24	2	2	drafting memorandum regarding resarch on class notice re fee motion	Motion for Attorney Fees	400	800
Dalton Courson	8/8/24	3.5	3.5	Revising memorandum in support of motion for fees	Motion for Attorney Fees	400	1400
Dalton Courson	8/8/24	0.5	0.5	confering with co-counsel regarding preparation of motion for fees and supporting exhibits, motion to stay opposition, and identifying special masters	Motion for Attorney Fees	400	200
Dalton Courson	8/9/24	4	4	Revising memorandum in support of motion for fees	Motion for Attorney Fees	400	1600
Dalton Courson	8/10/24	6	6	Revising memorandum in support of motion for fees	Motion for Attorney Fees	400	2400
Dalton Courson	8/13/24	0.5	0.5	Reviewing declarations for motion for fees (0.5)	Motion for Attorney Fees	400	200
Dalton Courson	8/15/24	0.5	0.5	Meeting with Mr. Childs to provide instruction regarding format and contents of bill of costs and supporting memorandum	Motion for Bill of Costs	400	200
Dalton Courson	8/15/24	0.5	0.5	drafted declaration for motion for fees	Motion for Attorney Fees	400	200
Dalton Courson	8/15/24	4	4	reviewing timesheets for former DRLA timewriters for fee submission for billing judgment and redaction	Motion for Attorney Fees	400	1600
Bruce Hamilton	1/31/19	0.5	0.5	Calls with Chelsea and Ron, configure data	Case Management	400	200
Bruce Hamilton	2/7/19	0.5	0.5	Telecom with team to discuss judge's ruling	Case Management - Team Meeting	400	200
Bruce Hamilton	2/21/19	2	2	Request for Production	Request for Production	400	800
Bruce Hamilton	5/30/19	5	5	Meeting	Vague	400	2000
Bruce Hamilton	6/4/19	5.5	5.5	Meet with clients	Client Meetings	400	2200

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Bruce Hamilton	6/5/19	2	2	Meet with clients	Client Meetings	400	800
Bruce Hamilton	6/19/19	0.5	0.5	Upload RFP 23 to Filemaker, populate field	Case Management - Document Management	400	200
Bruce Hamilton	8/15/19	2	2	Meet with team	Case Management - Team Meeting	400	800
Bruce Hamilton	8/22/19	2	2	Team meeting	Case Management - Team Meeting	400	800
Bruce Hamilton	7/30/20	1	1	Review, upload J. Sullivan documents.	Case Management - Document Management	400	400
Bruce Hamilton	8/3/20	0.5	0.5	Upload more Dotson files	Case Management - Document Management	400	200
Bruce Hamilton	8/9/20	2	2	Review, download, and summarize key U	Time Entry Issue	400	800
Bruce Hamilton	8/19/20	0.5	0.5	Document review (Shawn Francis), identif	Time Entry Issue	400	200
Bruce Hamilton	8/21/20	1	1	Team meeting re: outstanding tasks, delega	Case Management - Team Meeting	400	400
Bruce Hamilton	8/26/20	2	2	Review and upload Master Prison files of S	Time Entry Issue	400	800
Bruce Hamilton	8/27/20	1	1	Team meeting	Case Management - Team Meeting	400	400
Bruce Hamilton	8/31/20	1	1	Download and review documents for Shaw	Time Entry Issue	400	400
Bruce Hamilton	9/3/20	0.5	0.5	Team meeting	Case Management - Team Meeting	400	200
Bruce Hamilton	10/6/20	1	1	Doc review/upload for Shawn Francis	DWCC Doc Review	400	400
Bruce Hamilton	10/7/20	1	1	Review doc-review assignments, cross-refe	Time Entry Issue	400	400
Bruce Hamilton	10/9/20	1	1	Review RFP 11	Rule 11 Issue	400	400
Bruce Hamilton	10/12/20	3	3	Finish reviewing UORs in RFP 11, RFP 23	Unusual Occurrence Report	400	1200
Bruce Hamilton	10/14/20	0.5	0.5	Prepare for Moot by reviewing MIL briefs	Motion in Limine	400	200
Bruce Hamilton	11/2/20	0.5	0.5	Review and revise proposed Reply	Case Management	400	200
Bruce Hamilton	11/5/20	1	1	Team meeting	Case Management - Team Meeting	400	400
Bruce Hamilton	11/14/20	2	2	Review Anthony Caro's documents in FM	DWCC Doc Review	400	800
Bruce Hamilton	12/1/20	4	4	Review, code, and summarize Shawn Frani	Time Entry Issue	400	1600
Bruce Hamilton	12/2/20	4	4	Review, code, and summarize Shawn Frani	Time Entry Issue	400	1600
Bruce Hamilton	12/23/20	2	2	Review and tag/code Jesse Sullivan docum	Time Entry Issue	400	800
Bruce Hamilton	12/29/20	3	3	Review, tag, and summarize Jesse Sullivan	Time Entry Issue	400	1200
Bruce Hamilton	12/30/20	3	3	Review, tag, and summarize Jesse Sullivan	Time Entry Issue	400	1200
Bruce Hamilton	12/31/20	3	3	Review, tag, and summarize Jesse Sullivan	Time Entry Issue	400	1200
Bruce Hamilton	1/2/21	2	2	Review, tag, and summarize Jesse Sullivan	Time Entry Issue	400	800
Bruce Hamilton	1/5/21	4.5	4.5	30(b)(6) deposition of DRL	30(b)(6) Deposition	400	1800
Bruce Hamilton	1/7/21	1	1	Research discovery obligation w/r/t draft ex	Time Entry Issue	400	400
Bruce Hamilton	1/7/21	1	1	Review/revise Kathy's expert report	Working with Experts	400	400
Bruce Hamilton	1/13/21	0.5	0.5	Team meeting to discuss JT's role/assignme	Time Entry Issue	400	200
Bruce Hamilton	1/14/21	0.5	0.5	Team meeting with JT to discuss his work p	Time Entry Issue	400	200
Bruce Hamilton	1/15/21	2	2	Review more uploaded docs for Vincent D	Time Entry Issue	400	800
Bruce Hamilton	1/20/21	3	3	Review uploaded documents for Theron N	Time Entry Issue	400	1200
Bruce Hamilton	1/21/21	1	1	Team meeting	Case Management - Team Meeting	400	400
Bruce Hamilton	1/27/21	1	1	Continue Theron Nelson doc review	DWCC Doc Review	400	400
Bruce Hamilton	1/29/21	1	1	Continue Theron Nelson doc review (made	Time Entry Issue	400	400
Bruce Hamilton	1/31/21	2	2	Continue Theron Nelson doc review. Made	Time Entry Issue	400	800
Bruce Hamilton	2/2/21	2	2	Continue Theron Nelson doc review. Got t	Time Entry Issue	400	800
Bruce Hamilton	2/2/21	0.5	0.5	Review K. Burns expert materials (reports,	Time Entry Issue	400	200
Bruce Hamilton	2/3/21	1	1	Review Burns expert materials from Dunn	Time Entry Issue	400	400
Bruce Hamilton	2/4/21	2	2	Review Burns' expert materials (reports in	Time Entry Issue	400	800
Bruce Hamilton	2/7/21	2	2	Continue Shawn Francis doc review (to #6	Time Entry Issue	400	800
Bruce Hamilton	2/9/21	2	2	Shawn Francis doc review (to No. 800)	DWCC Doc Review	400	800
Bruce Hamilton	2/10/21	2	2	Continue Shawn Francis doc review (to 95	DWCC Doc Review	400	800
Bruce Hamilton	2/18/21	1	1	Shawn Francis doc review	DWCC Doc Review	400	400
Bruce Hamilton	2/19/21	1	1	Continue Shawn Francis doc review (1250	Time Entry Issue	400	400
Bruce Hamilton	2/20/21	1	1	Shawn Francis doc review (to 1300).	DWCC Doc Review	400	400
Bruce Hamilton	2/21/21	1	1	Shawn Francis doc review (to 1350).	DWCC Doc Review	400	400
Bruce Hamilton	2/22/21	1	1	Shawn Francis doc review (1400)	DWCC Doc Review	400	400
Bruce Hamilton	2/24/21	1	1	Team meet re depo strategy	Case Management	400	400
Bruce Hamilton	2/27/21	1	1	Shawn Francis doc review	DWCC Doc Review	400	400
Bruce Hamilton	3/1/21	1	1	Document review Shawn Francis	DWCC Doc Review	400	400
Bruce Hamilton	3/2/21	1	1	Review expert materials for Dr. Sanket Vya	Time Entry Issue	400	400
Bruce Hamilton	3/4/21	2	2	Doc review Shawn Francis	DWCC Doc Review	400	800
Bruce Hamilton	3/7/21	1	1	Shawn Francis doc review	DWCC Doc Review	400	400
Bruce Hamilton	3/8/21	0.5	0.5	Review defendants' expert reports/disclosur	Case Management	400	200
Bruce Hamilton	3/9/21	1	1	Team meeting re: doc review and Ds' expe	Time Entry Issue	400	400
Bruce Hamilton	3/11/21	0.5	0.5	Team meeting	Case Management - Team Meeting	400	200
Bruce Hamilton	3/12/21	3	3	Finish Shawn Francis doc review	DWCC Doc Review	400	1200
Bruce Hamilton	3/15/21	0.5	0.5	Review doc review assignments and progre	Time Entry Issue	400	200
Bruce Hamilton	3/15/21	2	2	Review K. Burns expert reports	Working with Experts	400	800
Bruce Hamilton	3/16/21	2	2	Meeting with experts (Haney and Burns)	Working with Experts	400	800
Bruce Hamilton	3/23/21	2	2	Observe deposition of Dan P.	Deposition	400	800
Bruce Hamilton	3/23/21	3.5	3.5	Depo of Dan P	Deposition	400	1400
Bruce Hamilton	3/24/21	1	1	Prepare for deposition by reviewing object	Time Entry Issue	400	400
Bruce Hamilton	3/26/21	3.5	3.5	Deposition of M. Richmond.	Deposition	400	1400
Bruce Hamilton	3/30/21	1	1	Team meeting	Case Management - Team Meeting	400	400
Bruce Hamilton	3/31/21	6	6	Deposition of Dr. J. Thompson	Deposition	400	2400
Bruce Hamilton	4/1/21	1	1	Team meeting	Case Management - Team Meeting	400	400
Bruce Hamilton	4/2/21	5.5	5.5	Deposition of James UpChurch	Deposition	400	2200
Bruce Hamilton	4/5/21	5.5	5.5	Deposition of Craig Haney	Deposition	400	2200
Bruce Hamilton	4/8/21	0.5	0.5	Expert deposition research	Deposition	400	200
Bruce Hamilton	4/9/21	0.5	0.5	Daimon Williams doc review	DWCC Doc Review	400	200
Bruce Hamilton	4/12/21	0.5	0.5	Williams doc review	DWCC Doc Review	400	200
Bruce Hamilton	4/16/21	0.5	0.5	Call with Magistrate MClusky	Appeal - Magistrate	400	200
Bruce Hamilton	4/29/21	1	1	Team meeting	Case Management - Team Meeting	400	400
Bruce Hamilton	5/3/21	0.5	0.5	Deposition review: Joshua Isaac	Deposition	400	200
Bruce Hamilton	5/5/21	2	2	Document review: James Washington	DWCC Doc Review	400	800
Bruce Hamilton	5/10/21	1	1	Document review: James Washington	DWCC Doc Review	400	400
Bruce Hamilton	5/11/21	1	1	Document review: James Washington	DWCC Doc Review	400	400
Bruce Hamilton	5/12/21	1	1	Document review: James Washington	DWCC Doc Review	400	400
Bruce Hamilton	5/14/21	1	1	Doc review: Troy Tennessee and Timothy	Time Entry Issue	400	400
Bruce Hamilton	5/19/21	1	1	Document review: Timothy Wells	DWCC Doc Review	400	400
Bruce Hamilton	5/21/21	1	1	Doc review: Juan Gomez	DWCC Doc Review	400	400
Bruce Hamilton	5/24/21	1	1	Document review: Juan Gomez	DWCC Doc Review	400	400
Bruce Hamilton	5/25/21	6.5	6.5	Review Dabert filings, research, and draft	Time Entry Issue	400	2600
Bruce Hamilton	6/3/19	5.5	5.5	Travel to Ruston	DWCC Visits - Travel	400	2200
Bruce Hamilton	6/4/19	2	2	Travel to, from prison	DWCC Visits - Travel	400	800
Bruce Hamilton	6/5/19	8	8	Travel to, from prison	DWCC Visits - Travel	400	3200
Robert Cobbs	8/11/20	0.5	0.5	Set up new case for Tellis v. LeBlanc	Class Certification	350	175
Robert Cobbs	8/14/20	0.5	0.5	Introductory case call	Class Certification	350	175
Robert Cobbs	11/11/20	1	1	Introductory case call	Class Certification	350	350
Robert Cobbs	11/12/20	0.5	0.5	Weekly case mgmt. mtg.	Case Management - Team Meeting	350	175
Robert Cobbs	11/19/20	1	1	Weekly case mgmt. meeting.	Case Management - Team Meeting	350	350
Robert Cobbs	11/19/20	4.5	4.5	Review complaint	Class Certification	350	1575
Robert Cobbs	12/10/20	1	1	Weekly case mgmt. mtg.	Case Management - Team Meeting	350	350
Robert Cobbs	12/17/20	1	1	Case mgmt. mtg.	Case Management - Team Meeting	350	350
Robert Cobbs	1/14/21	1	1	Weekly case mgmt. meeting	Case Management - Team Meeting	350	350
Robert Cobbs	1/28/21	1	1	Weekly case mgmt. mtg.	Case Management - Team Meeting	350	350

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Robert Cobbs	2/4/21	1	1	Weekly case mgmt. mtg	Case Management - Team Meeting	350	350
Robert Cobbs	2/4/21	3	3	Review class cert motions, expert reports.	Class Certification	350	1050
Robert Cobbs	2/11/21	1	1	Weekly case mgmt mtg.	Case Management - Team Meeting	350	350
Robert Cobbs	2/18/21	1	1	Weekly case mgmt call.	Case Management - Team Meeting	350	350
Robert Cobbs	3/4/21	1	1	Weekly case mgmt mtg.	Case Management - Team Meeting	350	350
Robert Cobbs	4/8/21	4.5	4.5	Research and draft class cert motion	Class Certification	350	1575
Robert Cobbs	4/9/21	4	4	Research and draft class cert motion	Class Certification	350	1400
Robert Cobbs	4/11/21	3.5	3.5	Research and draft class cert brief	Class Certification	350	1225
Robert Cobbs	4/12/21	2	2	Research and draft class cert motion.	Class Certification	350	700
Robert Cobbs	4/14/21	5	5	Research and draft class cert brief.	Class Certification	350	1750
Robert Cobbs	4/17/21	8.5	8.5	Draft class cert motion	Class Certification	350	2975
Robert Cobbs	4/22/21	1	1	Weekly case mgmt meeting	Case Management - Team Meeting	350	350
Robert Cobbs	4/26/21	0.5	0.5	Review PHV and local rules	Class Certification	350	175
Robert Cobbs	5/2/21	3.5	3.5	Edit class cert motion.	Class Certification	350	1225
Robert Cobbs	5/3/21	5.5	5.5	Edit class cert motion	Class Certification	350	1925
Robert Cobbs	5/4/21	1	1	Edit class cert draft.	Class Certification	350	350
Robert Cobbs	5/13/21	1	1	Weekly case mgmt meeting	Case Management - Team Meeting	350	350
Robert Cobbs	5/27/21	1	1	Weekly case mgmt mtg.	Case Management - Team Meeting	350	350
Robert Cobbs	6/1/21	5	5	Draft reply brief ISO class certification	Class Certification	350	1750
Robert Cobbs	6/9/21	0.5	0.5	Review class cert reply.	Class Certification	350	175
Robert Cobbs	6/10/21	1	1	Weekly case mgmt mtg.	Case Management - Team Meeting	350	350
Robert Cobbs	6/17/21	1	1	Weekly case mgmt mtg.	Case Management - Team Meeting	350	350
Robert Cobbs	6/24/21	1	1	Weekly case mgmt meeting	Class Certification	350	350
Robert Cobbs	7/15/21	1	1	Weekly case mgmt call.	Case Management - Team Meeting	350	350
Robert Cobbs	7/29/21	1	1	Weekly case mgmt call.	Case Management - Team Meeting	350	350
Robert Cobbs	8/12/21	0.5	0.5	Case mgmt mtg.	Case Management - Team Meeting	350	175
Robert Cobbs	10/10/21	6.5	6.5	Research and draft opposition to Defendants' petition for appeal	Appeal of Class Certification	350	2275
Robert Cobbs	10/13/21	0.5	0.5	Arrange for admission to 5 Cir., NOA.	Appeal of Class Certification	350	175
Robert Cobbs	10/14/21	1	1	Case mgmt call	Case Management	350	350
Robert Cobbs	4/29/22	0.5	0.5	Meet w/M. Bray and K. Schwartzmann re trial and	Trial Preparation	350	175
Robert Cobbs	7/30/24	1	1	Call w/M. Bray and D. Courson re appellate plan.	Case Management	350	350
Katie Schwartzmann	5/25/17	7	7	meeting with clients Dominick Imbruglio, Mussur, Jackie Ray Sampson and Joshua Williams	DWCC Visits	400	2800
Katie Schwartzmann	5/25/17	6	6	travel to and from DWCC from New Orleans via plane	DWCC Visits - Travel	400	2400
Katie Schwartzmann	6/20/17	2	2	Mtg w AC to prepare for client visits	DWCC Visits - Preparation	400	800
Katie Schwartzmann	6/21/17	8	8	Visits at DWCC	DWCC Visits	400	3200
Katie Schwartzmann	6/21/17	2	2	Travel to & from Shreveport to DWCC	DWCC Visits - Travel	400	800
Katie Schwartzmann	6/22/17	12	12	Visit to DWCC + transit to & from Shreveport	DWCC Visits	400	4800
Katie Schwartzmann	6/23/17	7.5	7.5	Driving bk to N.O. from DWCC	DWCC Visits - Travel	400	3000
Katie Schwartzmann	6/26/17	3.5	3.5	Drafting Carroll memo, general memo. Reviewing the notes and arps from three other prisoners and memorializing same.	DWCC Visit Memos	400	1400
Katie Schwartzmann	6/29/17	3	3	Meeting with RL, DH, JT, OW, CO, DW at MJC re next steps in follow up to visits. Two meetings after the larger group dispersed at 2.2 hours, with JT and DW seperately. Email to RL re same.	Case Management - Team Meeting	400	1200
Katie Schwartzmann	6/29/17	1	1	Drafting agenda for team meeting, based on emails, visit memos and doc review.	Case Management - Team Meeting	400	400
Katie Schwartzmann	7/16/17	5.5	5.5	Drive to minden	DWCC Visits - Travel	400	2200
Katie Schwartzmann	7/17/17	7.5	7.5	Meetings w clients	DWCC Visits	400	3000
Katie Schwartzmann	7/17/17	5.5	5.5	Travel back to N.O.	DWCC Visits - Travel	400	2200
Katie Schwartzmann	7/18/17	2	2	Edits to memo and complaint drafts	Complaint	400	800
Katie Schwartzmann	8/3/17	2	2	meeting at AC re fact gathering and next steps.	Case Management - Planning	400	800
Katie Schwartzmann	8/22/17	1	1	call w chelsea re client strategy	Call/Discussion - Co-Counsel	400	400
Katie Schwartzmann	8/27/17	6	6	Travel to DWCC, planning client meetings in the car w SV, JT and MB	DWCC Visits - Travel	400	2400
Katie Schwartzmann	8/27/17	2	2	Review of records	Vague	400	800
Katie Schwartzmann	8/28/17	9	9	Site visit: tour and mtgs w JW, JM AND CC	DWCC Visits	400	3600
Katie Schwartzmann	8/28/17	2	2	Debrief mtg, planning interviews for tomorrow	DWCC Visits - Preparation	400	800
Katie Schwartzmann	8/29/17	9	9	Site visit, 5 client interviews	DWCC Visits	400	3600
Katie Schwartzmann	8/29/17	6.5	6.5	Back to NO	DWCC Visits - Travel	400	2600
Katie Schwartzmann	9/28/17	7	7	Travel to DWCC, meeting and prep w JT en route incl. reviewing memos on clients were meeting	DWCC Visits - Travel	400	2800
Katie Schwartzmann	9/29/17	4	4	meetings w clients	Client Meetings	400	1600
Katie Schwartzmann	11/29/17	3.5	3.5	Mtg at AC ae DWCC	Case Management - Team Meeting	400	1400
Katie Schwartzmann	1/2/18	7	7	travel to DWCC, picking up rental car	DWCC Visits - Travel	400	2800
Katie Schwartzmann	1/3/18	9	9	Meetings w clients at DWCC	DWCC Visits	400	3600
Katie Schwartzmann	1/4/18	1	1	Travel to DWCC from hotel	DWCC Visits - Travel	400	400
Katie Schwartzmann	1/4/18	8	8	Tours and client meetings	DWCC Visits	400	3200
Katie Schwartzmann	1/6/18	1	1	drop off rental car	DWCC Visits - Travel	400	400
Katie Schwartzmann	1/19/18	0.5	0.5	email to J Vining re Steve Givens	Correspondence - Opposing Counsel	400	200
Katie Schwartzmann	1/19/18	0.5	0.5	email to RL re litigation hold	Correspondence - Co-Counsel	400	200
Katie Schwartzmann	2/12/18	0.5	0.5	Call w AC	Complaint	400	200
Katie Schwartzmann	6/12/18	4.5	4.5	Cite checking motion in limine with Jon	Motion in Limine	400	1800
Katie Schwartzmann	7/13/18	2	2	team intake meeting at AC, moved from Thursday to accommodate brief due yesterday. Review of discovery to go out, edits to same, emailing same.	Discovery	400	800
Katie Schwartzmann	7/23/18	2	2	Team discovery meeting	Discovery	400	800
Katie Schwartzmann	8/1/18	4.5	4.5	class cert proof meeting	Class Certification	400	1800
Katie Schwartzmann	8/13/18	6.5	6.5	Travel to DWCC, reviewing rogs and RFPs w JT en route	DWCC Visits - Travel	400	2600
Katie Schwartzmann	8/13/18	0.5	0.5	Mtg w JT re questions for clients	Call/Discussion - Co-Counsel	400	200
Katie Schwartzmann	8/14/18	8	8	Mtg w BC and AT Re disco	Discovery	400	3200
Katie Schwartzmann	8/15/18	4.5	4.5	Meeting w Robinson, Cory Adams, McDowell	Client Meetings	400	1800
Katie Schwartzmann	8/15/18	6.5	6.5	Travel home, much of the time spent working on class hearing with JT	DWCC Visits - Travel	400	2600
Katie Schwartzmann	8/23/18	1	1	Review of opposing brief to P.O. — notes for reply re same	Motion for Protective Order	400	400
Katie Schwartzmann	8/26/18	6	6	Drive to DWCC	DWCC Visits	400	2400
Katie Schwartzmann	8/27/18	8	8	Walk through w experts in morning, client visits in afternoon	DWCC Visits	400	3200
Katie Schwartzmann	8/27/18	1	1	Meeting w experts and JT	Working with Experts	400	400
Katie Schwartzmann	8/28/18	8	8	Expert site visit, reviewed files for John Booth, Dean and Jesse Sullivan while experts interviewed people. JT and I met with client.	DWCC Visits	400	3200
Katie Schwartzmann	8/29/18	6.5	6.5	Driving back to NO	DWCC Visits - Travel	400	2600
Katie Schwartzmann	9/12/18	7	7	Meetings with Wade witnesses	Working with Witnesses	400	2800
Katie Schwartzmann	9/12/18	3.5	3.5	Travel back to New Orleans from Angola	Travel	400	1400
Katie Schwartzmann	9/19/18	1	1	Call to defs re discovery	Discovery	400	400
Katie Schwartzmann	9/20/18	1	1	preparing expense reports	Case Management	400	400
Katie Schwartzmann	9/23/18	7	7	Drive to Wade	DWCC Visits	400	2800
Katie Schwartzmann	9/24/18	0.5	0.5	Meeting with JT to discuss outstanding discovery	Discovery	400	200
Katie Schwartzmann	9/24/18	7.5	7.5	Visits with clients	DWCC Visits	400	3000
Katie Schwartzmann	9/24/18	0.5	0.5	Meeting w JT re day's meetings	Case Management	400	200
Katie Schwartzmann	9/25/18	8	8	Full day of client meetings at DWCC—an entire hour spent waiting for Goodwin to bring the hard drive with body cam video on it	DWCC Visits	400	3200
Katie Schwartzmann	9/26/18	6	6	Travel to N.O. from DWCC	DWCC Visits	400	2400

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Katie Schwartzmann	10/2/18	4.5	4.5	Meetings with clients and witnesses	DWCC Visits	400	1800
Katie Schwartzmann	10/4/18	2	2	Team meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	10/16/18	0.5	0.5	review of motion for leave filed by defendants	Motion for Leave to File	400	200
Katie Schwartzmann	10/17/18	0.5	0.5	drafting mtf from notes from client visits	Case Management	400	200
Katie Schwartzmann	10/22/18	6	6	travel to and from LSP to see witness	Angola Visits - Travel	400	2400
Katie Schwartzmann	10/22/18	1	1	Meeting w witness	Angola Visits - Travel	400	400
Katie Schwartzmann	10/22/18	1	1	Waiting at front gate to get into LSP	Angola Visits - Travel	400	400
Katie Schwartzmann	10/26/18	2	2	Intake and strategy meeting	Client Intake	400	800
Katie Schwartzmann	10/29/18	1	1	Travel to and from AC for team meeting	Travel	400	400
Katie Schwartzmann	10/30/18	1	1	meeting with AC board member	Case Management	400	400
Katie Schwartzmann	10/31/18	1	1	review of opposition to MTC	Motion to Compel	400	400
Katie Schwartzmann	11/15/18	3	3	Team mtg re scheduling & intake	Case Management - Team Meeting	400	1200
Katie Schwartzmann	11/16/18	0.5	0.5	Scheduling conference w court	Status Conference	400	200
Katie Schwartzmann	11/16/18	0.5	0.5	meeting w C Rodriguez at AC re case resources moving forward	Case Management	400	200
Katie Schwartzmann	11/19/18	0.5	0.5	email to Haney re new scheduling order and time remaining on file	Working with Experts	400	200
Katie Schwartzmann	2/6/19	0.5	0.5	prep for court, call w MB and JT	Case Management	400	200
Katie Schwartzmann	2/14/19	2	2	Meet and confer	Meet and Confer	400	800
Katie Schwartzmann	2/15/19	0.5	0.5	review of defendants' discovery requests to AC	Discovery	400	200
Katie Schwartzmann	2/20/19	5.5	5.5	Ariel Robinson depositions	Deposition	400	2200
Katie Schwartzmann	2/20/19	1	1	Depo lunch meeting, drafting questions	Deposition - Preparation	400	400
Katie Schwartzmann	2/20/19	2	2	Travel to and from DWCC-Minden for depo of Robinson	Deposition - Travel	400	800
Katie Schwartzmann	2/21/19	6	6	Dauzat depo	Deposition	400	2400
Katie Schwartzmann	2/21/19	2	2	Dauzat depo— delay for court reporter	Deposition	400	800
Katie Schwartzmann	2/21/19	1	1	Depos— Dauzat	Deposition	400	400
Katie Schwartzmann	2/21/19	2	2	Meeting w JT	Case Management	400	800
Katie Schwartzmann	2/22/19	6	6	Client meetings	Client Meetings	400	2400
Katie Schwartzmann	3/12/19	6	6	Driving to DWCC	DWCC Visits - Travel	400	2400
Katie Schwartzmann	3/12/19	1	1	Meeting w JT and MB to prep for client meetings	Client Meetings - Preparation	400	400
Katie Schwartzmann	3/13/19	1	1	Drive to DWCC from hotel, working en route	DWCC Visits - Travel	400	400
Katie Schwartzmann	3/13/19	6.5	6.5	Meetings w clients	Client Meetings	400	2600
Katie Schwartzmann	3/27/19	3.5	3.5	Depo prep meeting w client	Deposition - Preparation	400	1400
Katie Schwartzmann	3/27/19	2	2	Travel to and from depo and hotel	Deposition - Travel	400	800
Katie Schwartzmann	3/28/19	4	4	Bruce Charles depo	Deposition	400	1600
Katie Schwartzmann	3/28/19	0.5	0.5	Depo file prep	Deposition - Preparation	400	200
Katie Schwartzmann	3/28/19	4	4	Nail depo	Deposition	400	1600
Katie Schwartzmann	3/28/19	2	2	Travel to and from DWCC for depositions	Deposition - Travel	400	800
Katie Schwartzmann	3/29/19	7	7	Hayden deposition	Deposition	400	2800
Katie Schwartzmann	3/29/19	8	8	Travel back to New Orleans from Homer	DWCC Visits - Travel	400	3200
Katie Schwartzmann	3/29/19	1	1	Wait for Hayden deposition	Deposition	400	400
Katie Schwartzmann	4/19/19	1	1	call w expert	Working with Experts	400	400
Katie Schwartzmann	4/25/19	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	4/25/19	0.5	0.5	review of pleadings filed by defendants	Case Matters	400	200
Katie Schwartzmann	4/30/19	0.5	0.5	Call with court for scheduling	Status Conference	400	200
Katie Schwartzmann	6/4/19	1	1	lunch meeting on break	Case Management	400	400
Katie Schwartzmann	6/4/19	7	7	meeting w clients	Client Meetings	400	2800
Katie Schwartzmann	6/4/19	2	2	travel to and from wade for meetings w clients	DWCC Visits - Travel	400	800
Katie Schwartzmann	6/5/19	5.5	5.5	travel to NO from DWCC, incl responding to emails and pcs w JT and MB re client	DWCC Visits - Travel	400	2200
Katie Schwartzmann	6/5/19	1	1	travel to DWCC from hotel	DWCC Visits - Travel	400	400
Katie Schwartzmann	8/22/19	2	2	team meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	9/5/19	5	5	Travel to Monroe to prepare for mtg w clients tomorrow	DWCC Visits - Travel	400	2000
Katie Schwartzmann	9/6/19	1	1	Debrief mtg w MB And JT	Case Management	400	400
Katie Schwartzmann	9/6/19	7.5	7.5	Meetings w named plaintiffs to review proposed settlements	Settlement Conference	400	3000
Katie Schwartzmann	9/6/19	3	3	Travel between DWCC and Monroe	DWCC Visits - Travel	400	1200
Katie Schwartzmann	9/7/19	6.5	6.5	Mtg w MB and JCT to chart lines of proof based upon current discovery	Discovery	400	2600
Katie Schwartzmann	9/9/19	5.5	5.5	Travel home from settlement conference in Monroe, brainstorming w MB and JT	DWCC Visits - Travel	400	2200
Katie Schwartzmann	9/12/19	3	3	edits to the memo in opposition to mental exams	Motion for Mental Exams	400	1200
Katie Schwartzmann	9/13/19	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	9/16/19	0.5	0.5	Call with JT to prepare for the meet and confer with defendants	Meet and Confer	400	200
Katie Schwartzmann	9/17/19	0.5	0.5	call w JT and MB re scheduling in prep for the meeting tomorrow.	Case Management	400	200
Katie Schwartzmann	9/18/19	0.5	0.5	meeting w MB and JT	Call/Discussion - Co-Counsel	400	200
Katie Schwartzmann	9/19/19	2	2	meeting w team on doc review division	DWCC Doc Review	400	800
Katie Schwartzmann	9/20/19	2	2	Weekly meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	10/22/19	5.5	5.5	Driving up to DWCC for expert site visit	DWCC Visits - Travel	400	2200
Katie Schwartzmann	10/23/19	9	9	Expert tour of DWCC	DWCC Visits	400	3600
Katie Schwartzmann	10/23/19	2	2	Travel to & from DWCC to hotel, debriefing	DWCC Visits - Travel	400	800
Katie Schwartzmann	10/24/19	8.5	8.5	Expert meetings w clients	Client Meetings	400	3400
Katie Schwartzmann	10/24/19	2	2	Travel to and from hotel—DWCC for expert meetings w clients	DWCC Visits - Travel	400	800
Katie Schwartzmann	10/25/19	6	6	travel back to N.O. from wade	DWCC Visits - Travel	400	2400
Katie Schwartzmann	11/1/19	4	4	review of motion for sanctions	Motion for Sanctions	400	1600
Katie Schwartzmann	12/1/19	6	6	Travel to DWCC for client depositions	Deposition - Travel	400	2400
Katie Schwartzmann	12/3/19	7	7	Meeting w clients to do depo prep	Deposition - Preparation	400	2800
Katie Schwartzmann	12/4/19	6.5	6.5	Client depositions	Deposition	400	2600
Katie Schwartzmann	12/4/19	5.5	5.5	Review of classification docs	Case Management - Document Management	400	2200
Katie Schwartzmann	12/4/19	0.5	0.5	Review of docs for client depo	Deposition - Preparation	400	200
Katie Schwartzmann	12/5/19	7.5	7.5	Client depositions by d, day 3	Deposition	400	3000
Katie Schwartzmann	12/5/19	0.5	0.5	Picking up rental car for my return	DWCC Visits - Travel	400	200
Katie Schwartzmann	12/6/19	6	6	Defending client depositions	Deposition	400	2400
Katie Schwartzmann	12/6/19	6	6	Travel back to NO from DWCC	DWCC Visits - Travel	400	2400
Katie Schwartzmann	12/8/19	4.5	4.5	Travel to Ruston for depositions	Deposition - Travel	400	1800
Katie Schwartzmann	12/10/19	6.5	6.5	Huff depo	Deposition	400	2600
Katie Schwartzmann	12/10/19	8	8	Prep for Sherman depo	Deposition - Preparation	400	3200
Katie Schwartzmann	12/12/19	7	7	Scriber and Pitts depositions	Deposition	400	2800
Katie Schwartzmann	1/12/20	5	5	Travel to Ruston for depositions	DWCC Visits	400	2000
Katie Schwartzmann	1/13/20	8	8	Taking depo of Jesse Jimerson, travel to and from wade	Block Billing	400	3200
Katie Schwartzmann	1/14/20	2	2	Travel to and from wade for depo of fuller	DWCC Visits	400	800
Katie Schwartzmann	1/15/20	0.5	0.5	Edit to draft reply on appeal on interrogatories	Appeal - Magistrate	400	200
Katie Schwartzmann	1/24/20	0.5	0.5	Call with J. Hornsby	Case Management	400	200
Katie Schwartzmann	1/24/20	0.5	0.5	Travel to AC for court status	Travel	400	200
Katie Schwartzmann	1/27/20	2	2	Meeting at AC for doc review. Prioritizing upload to FileMaker	DWCC Doc Review	400	800
Katie Schwartzmann	2/13/20	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	2/18/20	0.5	0.5	review of def's opp to our motion to compel depositions	Motion to Compel	400	200
Katie Schwartzmann	2/27/20	2	2	meeting re intake and next steps	Client Intake	400	800
Katie Schwartzmann	3/3/20	6.5	6.5	Depos of Hayden, Nail and Dauzat	Deposition	400	2600
Katie Schwartzmann	3/3/20	1	1	Travel to DWCC for Nail, Hayden and Dauzat merits depositions	DWCC Visits	400	400
Katie Schwartzmann	3/4/20	4	4	Seal deposition	Deposition	400	1600
Katie Schwartzmann	3/5/20	4	4	Long deposition	Deposition	400	1600
Katie Schwartzmann	3/6/20	7	7	Deposition of Gerry Goodwin	Deposition	400	2800
Katie Schwartzmann	3/6/20	7	7	Travel back to New Orleans from Homer	DWCC Visits	400	2800

Detailed Time Entries - Half-Hour Increments

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Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Katie Schwartzmann	4/2/20	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	4/9/20	1	1	Review of reply memo in support of motion to compel	Motion to Compel	400	400
Katie Schwartzmann	4/16/20	1	1	Weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	4/29/20	0.5	0.5	PC w MB and Rob re briefing	Case Management	400	200
Katie Schwartzmann	5/12/20	0.5	0.5	Status conf via zoom	Status Conference	400	200
Katie Schwartzmann	5/21/20	1	1	weekly check in	Case Management - Team Meeting	400	400
Katie Schwartzmann	5/27/20	0.5	0.5	received MTC order	Motion to Compel	400	200
Katie Schwartzmann	6/18/20	1	1	Weekly check in	Case Management - Team Meeting	400	400
Katie Schwartzmann	7/1/20	1	1	Call with Jon & MB	Case Management	400	400
Katie Schwartzmann	7/8/20	2	2	Weekly meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	8/6/20	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	8/19/20	1	1	meeting re outstanding issues	Case Management	400	400
Katie Schwartzmann	8/20/20	1	1	Weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	9/3/20	1	1	Team Meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	9/11/20	1	1	Mtg w MB re supp responses	Case Management	400	400
Katie Schwartzmann	11/19/20	3	3	Doc review of client file	DWCC Doc Review	400	1200
Katie Schwartzmann	11/25/20	2	2	Review client docs	DWCC Doc Review	400	800
Katie Schwartzmann	11/27/20	2	2	Client doc review	DWCC Doc Review	400	800
Katie Schwartzmann	12/7/20	1	1	Doc review client file	DWCC Doc Review	400	400
Katie Schwartzmann	12/7/20	1	1	Review of client docs	DWCC Doc Review	400	400
Katie Schwartzmann	12/11/20	1	1	Doc review client	DWCC Doc Review	400	400
Katie Schwartzmann	1/5/21	7.5	7.5	RL depo	Deposition	400	3000
Katie Schwartzmann	1/9/21	0.5	0.5	call w MB re expert reports and filing rules	Working with Experts	400	200
Katie Schwartzmann	1/11/21	6	6	review of expert reports	Working with Experts	400	2400
Katie Schwartzmann	1/14/21	0.5	0.5	team meeting re allocation of responsibilities	Case Management - Team Meeting	400	200
Katie Schwartzmann	1/21/21	1	1	Weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	1/28/21	1	1	team meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	2/4/21	1	1	team meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	3/18/21	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	3/25/21	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	4/1/21	0.5	0.5	Status conf.	Status Conference	400	200
Katie Schwartzmann	4/1/21	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	4/5/21	6	6	Craig Haney depo	Deposition	400	2400
Katie Schwartzmann	4/8/21	1	1	Team meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	4/22/21	2	2	weekly meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	5/6/21	2	2	Outlining of client depositions	Deposition	400	800
Katie Schwartzmann	5/13/21	1	1	Weekly team meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	5/15/21	2	2	Edits to our opposition to defendants Motion in Limine motion	Motion in Limine	400	800
Katie Schwartzmann	5/18/21	8	8	Edits to opposition to Defendants Motion in Limine motion to exclude all of our experts	Motion in Limine	400	3200
Katie Schwartzmann	5/20/21	1	1	team meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	5/24/21	6	6	drive to Monroe for settlement mediation, receipt and review of def filing en route	Mediation - Travel	400	2400
Katie Schwartzmann	5/25/21	9	9	mediation with J. McClusky	Mediation	400	3600
Katie Schwartzmann	5/26/21	3	3	mediation with J. McClusky	Mediation	400	1200
Katie Schwartzmann	5/26/21	5.5	5.5	drive from Monroe to New Orleans	DWCC Visits	400	2200
Katie Schwartzmann	5/27/21	0.5	0.5	weekly meeting re intakes	Case Management - Team Meeting	400	200
Katie Schwartzmann	6/14/21	1	1	call with MB re strategy on MSJ	Motion for Summary Judgement	400	400
Katie Schwartzmann	6/16/21	0.5	0.5	Call w MB and JT	Case Management	400	200
Katie Schwartzmann	6/16/21	1	1	Call re Motion in Limine Hearing	Motion in Limine	400	400
Katie Schwartzmann	6/24/21	0.5	0.5	weekly meeting	Case Management - Team Meeting	400	200
Katie Schwartzmann	6/29/21	0.5	0.5	Call re Motion in Limine Hearing	Motion in Limine	400	200
Katie Schwartzmann	7/2/21	0.5	0.5	Review of Def's ADA MSJ	Motion for Summary Judgement - ADA & RA	400	200
Katie Schwartzmann	7/7/21	1	1	Call with Emma, MB, JT	Case Management	400	400
Katie Schwartzmann	7/9/21	12	12	review and insertion of client depositions into Opp to Def's 8th A MSJ	Motion for Summary Judgement	400	4800
Katie Schwartzmann	7/11/21	17	17	Editing MSJ opposition	Motion for Summary Judgement	400	6800
Katie Schwartzmann	7/12/21	21	21	Edits to MSJ opp., research re same	Motion for Summary Judgement	400	8400
Katie Schwartzmann	7/19/21	3	3	review of questions for Motion in Limine hrg	Motion in Limine	400	1200
Katie Schwartzmann	7/21/21	0.5	0.5	review of expert questions for Motion in Limine hearing, feedback	Motion in Limine	400	200
Katie Schwartzmann	7/22/21	0.5	0.5	Meeting w JT and MB re prep for the Motion in Limine hearing	Motion in Limine	400	200
Katie Schwartzmann	7/25/21	1	1	Monday			
Katie Schwartzmann	7/25/21	1	1	Prep for hearing tomorrow	Motion in Limine	400	400
Katie Schwartzmann	8/5/21	2	2	weekly meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	8/5/21	1	1	meeting re staffing at trial and firm recruiting	Case Management - Staffing	400	400
Katie Schwartzmann	8/12/21	0.5	0.5	weekly meeting	Case Management - Team Meeting	400	200
Katie Schwartzmann	8/16/21	0.5	0.5	emails from ED and MB re voluntary cessation and status conference today	Case Management	400	200
Katie Schwartzmann	8/19/21	2	2	weekly meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	9/9/21	2	2	Weekly meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	9/15/21	3	3	Meeting with Trial Team and other contracting attorneys to plan for trial	Trial Preparation	400	1200
Katie Schwartzmann	9/30/21	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	10/7/21	2	2	Witness / proof chart meeting	Working with Witnesses	400	800
Katie Schwartzmann	11/4/21	4	4	weekly meeting	Case Management - Team Meeting	400	1600
Katie Schwartzmann	11/24/21	0.5	0.5	call re demonstrative aids and evidence	Trial Preparation	400	200
Katie Schwartzmann	12/2/21	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	12/14/21	1	1	Conversation with ED re/trial planning	Trial Preparation	400	400
Katie Schwartzmann	12/15/21	2	2	Zoom call to prepare for pretrial conference	Pre-Trial Conference	400	800
Katie Schwartzmann	12/16/21	1	1	Call with client re testimony	Trial Preparation	400	400
Katie Schwartzmann	12/16/21	3.5	3.5	Pretrial conference w court	Pre-Trial Conference	400	1400
Katie Schwartzmann	12/16/21	1	1	Team meeting in advance of PTC	Case Management - Team Meeting	400	400
Katie Schwartzmann	12/26/21	4.5	4.5	team meeting on order of witnesses and length of testimony	Case Management - Team Meeting	400	1800
Katie Schwartzmann	1/3/22	0.5	0.5	Reviewing order of witnesses and mapping question review	Trial Preparation	400	200
Katie Schwartzmann	1/6/22	9	9	trial prep, edits to presentations and witnesses	Trial Preparation	400	3600
Katie Schwartzmann	1/7/22	10	10	law student prep, meeting w ED, edits to lines of questioning and oral presentations	Block Billing	400	4000
Katie Schwartzmann	1/8/22	7	7	edits to oral presentations and organizing scheduling	Trial Preparation	400	2800
Katie Schwartzmann	1/9/22	4	4	edits to presentatoin, emails re service, last minute housekeeping	Trial Preparation	400	1600
Katie Schwartzmann	1/13/22	15	15	trial, preparation for next day-- Norris, Pitts, Adams, McDowell, Baird	Trial Preparation	400	6000
Katie Schwartzmann	2/17/22	1	1	weekly meeting	Case Management - Team Meeting	400	400
Katie Schwartzmann	3/31/22	2	2	weekly meeting	Case Management - Team Meeting	400	800
Katie Schwartzmann	4/14/22	0.5	0.5	weekly meeting	Case Management - Team Meeting	400	200
Katie Schwartzmann	4/19/22	2	2	UOF review	Use of Force	400	800
Katie Schwartzmann	4/20/22	0.5	0.5	Email from MB re disco for remedy	Discovery	400	200
Katie Schwartzmann	4/20/22	1	1	UOF Review	Use of Force	400	400
Katie Schwartzmann	4/24/22	1	1	UOF review	Unusual Occurrence Report	400	400
Katie Schwartzmann	4/29/22	0.5	0.5	PC w MB and Rob re appellate briefing	Appeal - Magistrate	400	200
Katie Schwartzmann	4/30/22	1	1	UOF Doc review	Use of Force	400	400
Katie Schwartzmann	5/1/22	1	1	UOF review	Use of Force	400	400
Katie Schwartzmann	5/1/22	2	2	UOF review	Use of Force	400	800

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Katie Schwartzmann	5/3/22	2	2	UOF review	Use of Force	400	800
Katie Schwartzmann	5/13/22	1	1	Edits and drafting reply motion to opposition to our motion to compel RFPs	Motion to Compel	400	400
Katie Schwartzmann	5/17/22	0.5	0.5	Doc review	DWCC Doc Review	400	200
Katie Schwartzmann	5/19/22	1	1	Mtg re doc review, motion to compel	Motion to Compel	400	400
Katie Schwartzmann	5/21/22	3	3	Finished doc review of second suppl. Production	DWCC Doc Review	400	1200
Katie Schwartzmann	5/22/22	0.5	0.5	edits to letter to clients	Client Communications	400	200
Katie Schwartzmann	6/10/22	0.5	0.5	edits to additional RFPs and motion re same	RFP	400	200
Katie Schwartzmann	7/4/22	2	2	Meeting a MB, DC re depo prep and stipulations, appeal prep, following up on discovery	Deposition - Preparation	400	800
Katie Schwartzmann	7/7/22	1	1	team mtg w MB DC EM re letters, depositions, 30b6, discovery requests	Discovery	400	400
Katie Schwartzmann	7/27/22	0.5	0.5	PC w MB re testimony re Co-5 by dauzat	C-05 Reports	400	200
Katie Schwartzmann	8/13/24	4	4	review of fees memo, edits re same	Motion for Attorney Fees	400	1600
Katie Schwartzmann	8/14/24	0.5	0.5	Call with MB re fees	Motion for Attorney Fees	400	200
Katie Schwartzmann	8/14/24	9	9	fees reasonableness review, redaction fo privileged material, deletion of dups and admin errors	Motion for Attorney Fees	400	3600
Katie Schwartzmann	8/15/24	11	11	fees reasonableness review, redaction fo privileged material, deletion of dups and admin errors, PCs to MB re sa	Motion for Attorney Fees	400	4400
Jamila Johnson	11/2/21	1	1	Meet to plan David Wade trial transition and sort witnesses	Working with Witnesses	400	400
Jamila Johnson	11/4/21	0.5	0.5	Review requirements for WDLA admission and arrange signatures for team	Staffing Matters	400	200
Jamila Johnson	11/19/21	2	2	Review David Wade files	Case Management	400	800
Jamila Johnson	11/19/21	1	1	Continue David Wade file review	Case Management - Document Management	400	400
Jamila Johnson	12/2/21	0.5	0.5	David Wade Call	Case Management	400	200
Jamila Johnson	12/5/21	4.5	4.5	Review documents for Corey Adams	Working with Witnesses	400	1800
Jamila Johnson	12/6/21	1	1	Prepare Corey Adams for Trial	Working with Witnesses	400	400
Jamila Johnson	12/9/21	1	1	David Wade Call	Call/Discussion - Co-Counsel	400	400
Jamila Johnson	12/10/21	1	1	Second Prep session for trial with Q Moran	Trial Preparation	400	400
Jamila Johnson	12/16/21	1	1	David Wade weekly team call	Case Management - Team Meeting	400	400
Jamila Johnson	12/17/21	4	4	Update witness examinations and finalize same and distribute to team	Working with Witnesses	400	1600
Jamila Johnson	12/17/21	2	2	Review expert reports and witness exhibits	Trial Preparation	400	800
Jamila Johnson	12/20/21	1.5	1.5	Meet with Corey Adams and prepare for trial	Trial Preparation	400	600
Jamila Johnson	12/22/21	1	1	Trial Prep with Q Moran	Trial Preparation	400	400
Jamila Johnson	1/1/22	2	2	Refine outline for Corey Adams	Working with Witnesses	400	800
Jamila Johnson	1/2/22	2.5	2.5	Refine outline for Quentin Moran	Trial Preparation	400	1000
Jamila Johnson	1/3/22	1	1	Meet with Corey Adams	Working with Witnesses	400	400
Jamila Johnson	1/4/22	4	4	Prepare for and present Witness Workshop	Working with Witnesses	400	1600
Jamila Johnson	1/4/22	1	1	Prep with Quentin Moran for testimony	Trial Preparation	400	400
Jamila Johnson	1/5/22	3	3	Prep Corey Adams	Working with Witnesses	400	1200
Jamila Johnson	1/6/22	2.5	2.5	David Wade Team Meeting	Case Management - Team Meeting	400	1000
Jamila Johnson	1/6/22	0.5	0.5	Josh and Zach's direct exam conversation	Trial Preparation	400	200
Jamila Johnson	1/7/22	1	1	Morning Prep with Moran for trial	Trial Preparation	400	400
Jamila Johnson	1/7/22	1	1	Afternoon prep with Moran	Trial Preparation	400	400
Elena Malik	12/5/21	0.5	0.5	Draft Motion to Enroll	Motion to Enroll	250	125
Elena Malik	12/8/21	1.5	1.5	Meeting with Demarcus Thomas	Client Meetings	250	375
Elena Malik	12/8/21	1.5	1.5	Review Notes from Demarcus Visits	Client Meetings	250	375
Elena Malik	12/10/21	3.5	3.5	Demarcus Thomas Deposition Outline	Deposition	250	875
Elena Malik	12/10/21	0.5	0.5	Depo Training	Deposition	250	125

Detailed Time Entries - Half-Hour Increments

Exhibit 1

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Elena Malik	12/12/21	1.5	1.5	Depo Prep	Deposition - Preparation	250	375
Elena Malik	12/12/21	7	7	Travel to DWCC	DWCC Visits	250	1750
Elena Malik	12/13/21	1.5	1.5	Depo Prep	Deposition - Preparation	250	375
Elena Malik	12/13/21	2	2	Travel to DWCC	DWCC Visits	250	500
Elena Malik	12/13/21	2.5	2.5	Client Visit	Client Meetings	250	625
Elena Malik	12/13/21	7	7	Travel from David Wade	DWCC Visits	250	1750
Elena Malik	12/14/21	3	3	Depo Prep	Deposition - Preparation	250	750
Elena Malik	12/14/21	5.5	5.5	Demarcus Thomas Deposition	Deposition	250	1375
Elena Malik	12/14/21	0.5	0.5	Deposition Recap	Deposition	250	125
Elena Malik	12/16/21	0.5	0.5	DWCC team meeting	Case Management - Team Meeting	250	125
Elena Malik	12/16/21	3.5	3.5	DWCC Status Conference	Status Conference	250	875
Elena Malik	12/26/21	2.5	2.5	David Wade Deposition Redactions	Deposition	250	625
Elena Malik	1/3/22	1	1	David Wade Witness Outline	Working with Witnesses	250	250
Elena Malik	1/4/22	3	3	David Wade Witness Outline	Working with Witnesses	250	750
Elena Malik	1/5/22	0.5	0.5	David Wade Witness Outline	Working with Witnesses	250	125
Elena Malik	1/6/22	2	2	DWCC Team Meeting	Case Management - Team Meeting	250	500
Elena Malik	1/6/22	1.5	1.5	David Wade Exam Workshop	Vague	250	375
Elena Malik	1/7/22	0.5	0.5	David Wade Witness Prep	Working with Witnesses	250	125
Elena Malik	1/21/22	1.5	1.5	David Wade Client Meeting	Client Meetings	250	375
Rebecca Ramaswamy	11/18/21	3	3	Zoom meeting with clients for depo prep	Deposition - Preparation	300	900
Rebecca Ramaswamy	12/6/21	1.5	1.5	Client witness brainstorm	Client Communications	300	450
Rebecca Ramaswamy	12/7/21	1.5	1.5	Drive to Hunt	EHCC Visits	300	450
Rebecca Ramaswamy	12/9/21	2	2	Weekly team meeting	Case Management - Team Meeting	300	600
Rebecca Ramaswamy	12/10/21	1	1	Zoom call with client to prep for testimony	Trial Preparation	300	300
Rebecca Ramaswamy	12/16/21	1	1	Weekly team meeting	Case Management - Team Meeting	300	300
Rebecca Ramaswamy	12/16/21	1	1	Brooks Deposition Preparation	Deposition - Preparation	300	300
Rebecca Ramaswamy	12/23/21	1	1	Prepping client for trial	Trial Preparation	300	300
Rebecca Ramaswamy	12/30/21	1.5	1.5	Weekly team meeting	Case Management - Team Meeting	300	450
Rebecca Ramaswamy	1/4/22	1	1	Prepping client for trial	Trial Preparation	300	300
Rebecca Ramaswamy	1/5/22	1.5	1.5	Prepping client for trial	Trial Preparation	300	450
Rebecca Ramaswamy	1/5/22	1	1	Prepping client for trial	Trial Preparation	300	300
Rebecca Ramaswamy	1/6/22	1.5	1.5	Direct exam training	Trial Preparation	300	450
Rebecca Ramaswamy	1/6/22	1	1	Prepping client for trial	Trial Preparation	300	300
Rebecca Ramaswamy	1/7/22	1	1	Prepping client for trial	Trial Preparation	300	300
Nishi Kumar	Not Provided	1	1	Call with Emma	Vague	300	300
Nishi Kumar	Not Provided	1	1	David Wade Class Cert Review	Class Certification	300	300
Nishi Kumar	Not Provided	1	1	David Wade co-counsel agreement review and comms	Case Management - Professional Services Agreement	300	300
Nishi Kumar	Not Provided	1	1	David Wade team call	Case Management - Team Meeting	300	300
Nishi Kumar	Not Provided	1	1	David Wade logistics and comms	Case Management	300	300
Nishi Kumar	Not Provided	1	1	DW cocounsel comms	Case Management - Professional Services Agreement	300	300
Nishi Kumar	Not Provided	1	1	David Wade witness logistics	Trial Preparation	300	300
Nishi Kumar	Not Provided	1	1	David Wade Comms	Vague	300	300
Nishi Kumar	Not Provided	1	1	David Wade Comms	Vague	300	300
Nishi Kumar	Not Provided	1	1	Meet with Emma	Call/Discussion - Co-Counsel	300	300
Nishi Kumar	Not Provided	1	1	David Wade witness logistics	Working with Witnesses	300	300
Nishi Kumar	Not Provided	2	2	David Wade Witness Prep	Working with Witnesses	300	600
Nishi Kumar	Not Provided	0.5	0.5	Send ACA docs	Case Management	300	150
Nishi Kumar	Not Provided	0.5	0.5	Rebecca Check In	Case Management	300	150
Nishi Kumar	Not Provided	1.5	1.5	David Wade witness prep allocations	Working with Witnesses	300	450
Nishi Kumar	Not Provided	1	1	David Wade meeting	Case Management - Team Meeting	300	300
Nishi Kumar	Not Provided	2	2	David Wade Witness Prep	Working with Witnesses	300	600
Nishi Kumar	Not Provided	1	1	David Wade witness prep allocations	Working with Witnesses	300	300
Nishi Kumar	Not Provided	2	2	David Wade team meeting	Case Management - Team Meeting	300	600
Nishi Kumar	Not Provided	1	1	Civil Lit Check In	Vague	300	300
Nishi Kumar	Not Provided	1	1	David Wade witness prep allocations	Working with Witnesses	300	300
Nishi Kumar	Not Provided	1	1	David Wade team meeting	Case Management - Team Meeting	300	300
Nishi Kumar	Not Provided	2	2	David Wade witness meeting	Working with Witnesses	300	600
Nishi Kumar	Not Provided	1	1	Check in with Sammy	Vague	300	300
Nishi Kumar	Not Provided	1	1	David Wade witness meeting	Working with Witnesses	300	300
Nishi Kumar	Not Provided	2	2	Witness Brainstorm	Working with Witnesses	300	600
Nishi Kumar	Not Provided	2	2	David Wade Witness Prep	Working with Witnesses	300	600
Nishi Kumar	Not Provided	1	1	David Wade visit logistics	DWCC Visits	300	300
Nishi Kumar	Not Provided	2	2	Depo Prep Training	Deposition - Preparation	300	600
Nishi Kumar	Not Provided	7	7	David Wade Depo Prep Trip	DWCC Visits	300	2100
Nishi Kumar	Not Provided	3.5	3.5	Depo prep	Deposition - Preparation	300	1050
Nishi Kumar	Not Provided	6	6	David Wade Depo Prep Trip	DWCC Visits	300	1800
Nishi Kumar	Not Provided	6	6	David Wade Depo	Deposition	300	1800
Nishi Kumar	Not Provided	2	2	David Wade meeting and pre-trial conference	Pre-Trial Conference	300	600
Nishi Kumar	Not Provided	1	1	David Wade meeting and pre-trial conference	Pre-Trial Conference	300	300
Nishi Kumar	Not Provided	1	1	David Wade Depo	Deposition	300	300
Nishi Kumar	Not Provided	4	4	Review depo testimony for redactions	Depositions	300	1200
Nishi Kumar	Not Provided	2	2	David Wade witness interview and exam draft	Working with Witnesses	300	600
Nishi Kumar	Not Provided	2	2	David Wade witness interview and exam draft	Working with Witnesses	300	600
Nishi Kumar	Not Provided	2	2	David Wade Witness prep	Working with Witnesses	300	600
Nishi Kumar	Not Provided	2	2	David Wade Witness prep	Working with Witnesses	300	600
Nishi Kumar	Not Provided	9	9	David Wade Witness prep	Working with Witnesses	300	2700
Nishi Kumar	Not Provided	4	4	David Wade Witness prep	Working with Witnesses	300	1200
Nishi Kumar	Not Provided	4	4	David Wade Witness training and prep	Working with Witnesses	300	1200
Nishi Kumar	Not Provided	4	4	David Wade Witness training and prep	Working with Witnesses	300	1200
Nishi Kumar	Not Provided	4.5	4.5	David Wade Witness training and prep	Working with Witnesses	300	1350
Nishi Kumar	Not Provided	1	1	David Wade team meeting	Case Management - Team Meeting	300	300
Nishi Kumar	Not Provided	5	5	David Wade prep and trainings	Trial Preparation	300	1500
Nishi Kumar	Not Provided	1	1	David Wade Witness training and prep	Working with Witnesses	300	300
Nishi Kumar	Not Provided	1	1	David Wade Witness training and prep	Working with Witnesses	300	300
Nishi Kumar	Not Provided	7	7	David Wade Witness prep	Working with Witnesses	300	2100
Nishi Kumar	Not Provided	5	5	David Wade Witness prep	Working with Witnesses	300	1500
Samantha Bosalavage	11/1/21	1.00	1.00	wade pleading review	Complaint	250	250.00
Samantha Bosalavage	11/17/21	0.50	0.50	wade client prep	Trial Preparation	250	125.00
Samantha Bosalavage	11/22/21	1.00	1.00	wade client interview: Chris Solomon	Client Interview	250	250.00
Samantha Bosalavage	12/17/21	2.00	2.00	Deposition of Ronald Brooks	Deposition	250	500.00
Samantha Bosalavage	12/21/21	0.50	0.50	wade witness prep	Working with Witnesses	250	125.00
Samantha Bosalavage	1/6/22	3.00	3.00	wade witness prep training	Working with Witnesses	250	750.00
M. Bray	08/17/2024	1.00	1.00	Reviewing motion for leave to file excess pages for fees motion. Created TOA. Finalized pleadings for motion for fees and costs. Had a lot of difficulty with e-filing due to file size, but was finally able to get it all filed.	Motion for Attorney Fees/Costs	300	300.00
M. Bray	08/17/2024	1.00	1.00	Call with Katie re. the notice of fees for DWCC. Sent an email to Katie and Dalton to recap and get us all on the same page	Motion for Attorney Fees/Costs	300	150.00
M. Bray	08/21/2024	0.50	0.50	Call with Katie and Dalton re. notice to the class for attorney fees and costs	Motion for Attorney Fees/Costs	300	150.00

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	08/23/2024	3.00	3.00	Revising the notice for fees and the notice to be sent to the class for DWCC	Motion for Attorney Fees/Costs	300	900.00
				Revising the notice for fees and the notice to be sent to the class for DWCC. Reviewed the revisions with Dalton and discussed strategy and next steps.	Motion for Attorney Fees/Costs	300	300.00
M. Bray	08/23/2024	1.00	1.00	Reviewing and revising motion for notice of fees for DWCC.	Motion for Attorney Fees/Costs	300	150.00
M. Bray	08/26/2024	0.50	0.50	Discussed with Dalton the revisions.	Motion for Attorney Fees/Costs		
M. Bray	08/28/2024	0.50	0.50	Zoom call with Curtis Belton at EHCC	Client Communications	300	150.00
M. Bray	09/19/2024	3.50	3.50	Calls with 6 prisoners at DWCC	Client Communications	300	1050.00
				Reviewed the motion to stay and our opposition to stay at the 5th Cir for DWCC. Will file in the morning.	Various Motions	300	150.00
M. Bray	12/18/2024	0.50	0.50	Meeting to discuss prep for status conference in the morning for DWCC	Status Conference	300	300.00
M. Bray	01/14/2025	1.00	1.00	Reviewing documents to prepare for status conference in the morning for DWCC [time reduced by 50%]	Status Conference	300	300.00
				Status Conference with Judge Foote via Zoom for DWCC and debrief with the team afterward.	Status Conference	300	300.00
M. Bray	01/15/2025	1.00	1.00	Met with Plum about a few DWCC related matters	Call/Discussion/Meeting - Co-Counsel	300	150.00
M. Bray	03/06/2025	0.50	0.50	Fleshed out a few of my notes from the DWCC calls this morning, shared the Google Doc with Dalton and Plum so they have the notes from my calls.	Call/Discussion/Meeting - Co-Counsel	300	150.00
				Met with Dalton to discuss strategy before the status conference with Judge Foote at 9:00 for DWCC	Call/Discussion/Meeting - Co-Counsel	300	150.00
M. Bray	04/23/2025	0.50	0.50	Status conference with Judge Foote re. DWCC	Status Conference	300	150.00
M. Bray	4/23/2025	0.50	0.50	Exchanging emails with Katie and Michael Bien re. the attorney fees for DWCC. We will have a meeting on Monday afternoon to discuss	Motion for Attorney Fees/Costs	300	300.00
M. Bray	5/9/2025	0.50	0.50	Call with Mike Bien, Katie and Dalton re. representation on attorney fees for DWCC	Call/Discussion/Meeting - Co-Counsel	300	150.00
				Call with Rob Cobbs and Dalton to update Rob about the status of DWCC	Call/Discussion/Meeting - Co-Counsel	300	150.00
M. Bray	5/12/2025	1.00	1.00	Call with Mike Bien re. fee representation for DWCC	Motion for Attorney Fees/Costs	300	300.00
M. Bray	5/19/2025	0.50	0.50	Drafting proposed scheduling order for DWCC	Scheduling Conferences/Orders	300	150.00
M. Bray	5/22/2025	1.00	1.00	Drafted Motion to Withdraw and proposed order for Nora Ahmed. Emailed to her for review before I file.	Motions for Leave	300	1800.00
M. Bray	6/3/2025	0.50	0.50	Finalizing proposed scheduling order for DWCC. Finalizing motion for visit to DWCC. Filed proposed order. Emailed motion for site visit to opposing counsel for their review so we can file Monday.	Various Motions	300	300.00
				Pulled time records report from 8/16/2024 to 6/15/2025 for DWCC. Sorted and organized the Excel spreadsheet, emailed Meeting with John Adcock and Dalton re. DWCC and fees	Incomplete time entry		
M. Bray	6/15/2025	1.00	1.00	Reviewing emails re. time records and costs for DWCC from John to our co-counsel	Motion for Attorney Fees/Costs	300	150.00
M. Bray	6/16/2025	0.50	0.50	Looking at prior correspondence from gentlemen housed at Hunt and beginning to pull together a list for Ms. Bray of folks we need to visit (.3) Reviewing voicemail and calling back to Raymond Laborde to verify recent legal mail, including transfer and hold time (.2) Reviewing voicemails and responding to Intake and Reception regarding callbacks to DWCC loved ones and class members (.3) Generating index for binders for the Court; printing Rec. Doc. 790 and all attachments and exhibits; creating labels; troubleshooting labels; sourcing binders and hole punched paper; troubleshooting printer; putting binders together; checking for completeness; creating cover sheet; delivering to Mr. Courson / Ms. Bray for taking to FedEx (.2.8) Sifting through dropbox folder and recent letters to identify folks we need to see soon; generating list of suggestions for scheduling visits and sending to Ms. Bray (.6) Two attempts to call back to Mr. SY, who verifying legal correspondence sent Friday with LAR (large envelopes with copies of full Remedy decision) (.2) Printing new letter scan cover sheets (.1) Opening, scanning, and saving new letters (.3) Generating call memos regarding attorney calls placed on 9/19/24 based on call notes created by Ms. Bray; troubleshooting minor issue with naming conventions in dropbox (.7) Organizing files in dropbox based on housing location updates (.7) Organizing physical letters in call to DWCC mail room to confirm legal mail that we sent last week, including transfers and hold times (see notes on DWCC Mail Room Call Tracking spreadsheet) (.4) Returning call from social worker at EHCC on behalf of client with significant mental illness who will be releasing soon (.4) Typing up memo from handwritten call notes (.3) Filling out FAIR referral form on behalf of said client and delivering to Mr. Andreson (.2) Opening, scanning, and saving new letters Dumas who left us a message on DRLA's main phone line; the woman who answered acted at first like she did not know who Ms. Dumas is. I said I thought it was to verify legal mail, and she said "I don't know." So I asked to speak to the mail room, and she said the phone in there is broken. She asked someone else if the phone in the mail room is still broken, told me to hold on, and apparently set down the phone. After 7 minutes, she came back and answered the phone as though I was a new call. I told her I was still the same person, on hold, waiting to speak to Ms. Dumas. Without saying anything further, she transferred me to some line that just kept ringing and ringing until I hung up. (.2) Organizing files in DWCC	Motion for Attorney Fees/Costs	108	486.00
P. Birk	08/27/2024	5.00	4.50	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Mass Mailings	108	324.00
				Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)	Mass Mailings	108	216.00
P. Birk	08/27/2024	5.00	4.50	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Mass Mailings	108	324.00
				Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)	Mass Mailings	108	216.00
P. Birk	09/23/2024	3.00	3.00	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Mass Mailings	108	162.00
				Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)	Mass Mailings	108	162.00
P. Birk	09/25/2024	1.50	1.50	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Mass Mailings	108	216.00
				Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)	Mass Mailings	108	216.00
P. Birk	10/03/2024	2.00	2.00	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Mass Mailings	108	216.00
				Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)	Mass Mailings	108	216.00
P. Birk	10/09/2024	2.00	2.00	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Mass Mailings	108	216.00
				Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)	Mass Mailings	108	216.00
P. Birk	10/17/2024	5.50	5.50	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)	Mass Mailings	108	594.00
				Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)	Mass Mailings	108	594.00

Detailed Time Entries - Half-Hour Increments						Exhibit 1	
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
				Opening, scanning, and saving new letters (3.7) Generating outgoing response letters from memos and template; printing; creating address labels; printing; printing enclosures; prepping envelopes with ink and postage stamps; stuffing and sealing; scanning outgoing envelopes; filling out mail request form for someone to take my letters to the post office since the Receptionist isn't here today; email to Mr. Carter to let him know I have mail that needs to go out (1.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.2)		108	324.00
P. Birk	10/18/2024	3.00	3.00	Verifying legal mail with two different prisons on behalf of class members, including hold time (4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder, including several very lengthy ones (4.6) Verifying last week's Legal mail to class members with mail room at LSP (2) Moving items out of weekly intake folder and into individual complainants' folders on DropBox; generating new folders where needed; editing file names to remove leading numbers; updating mass mail list to reflect new writers (6) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.7)	Inmate Letters/Intake Letters/Inmate Response L	108	540.00
P. Birk	10/24/2024	5.00	5.00	Opening, scanning, and saving new letters (3.7) Minor tidying of physical letters in personal office (2) Working on organization of class member letters in DWCC files closet (1.0) Reviewing, memo'ing, and responding to letters in Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.5)	Inmate Letters/Intake Letters/Inmate Response L	108	486.00
P. Birk	10/28/2024	4.50	4.50	Opening, scanning, and saving new letters from class members (3) Organizing physical letters in DWCC files closet (1.1) Reviewing, memo'ing, and responding to letters in weekly intake folder (6)	Inmate Letters/Intake Letters/Inmate Response L	108	270.00
P. Birk	11/15/2024	2.50	2.50	Starting process of compiling records we have for one class member into a combined folder that we can share with his attorney (5) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.0)	Inmate Letters/Intake Letters/Inmate Response L	108	162.00
P. Birk	11/19/2024	1.50	1.50	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.0)	Inmate Letters/Intake Letters/Inmate Response L	108	216.00
P. Birk	11/27/2024	2.00	2.00	Moving memos, received letters, response letters, and cover letters into individual complainants' folders in DropBox (3) Opening, scanning, and saving new letters, including one very lengthy one (3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.4)	Inmate Letters/Intake Letters/Inmate Response L	108	378.00
P. Birk	12/12/2024	3.50	3.50	I missed a call over lunch from a class member's sister whom I left a message for last week; reviewed and attempted a call back; missed her again and will try tomorrow (1) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (4.9)	Inmate Letters/Intake Letters/Inmate Response L	108	108.00
P. Birk	01/16/2025	1.00	1.00	Combining through records and making copies of items for class member who requested we send his records to his retained attorney; once I was sure I had gathered them all, I sent a link to Ms. Bray to share with the attorney (1.2) Confirming legal correspondence to class member currently housed at LSP with M/Sgt. Lartigue in the mail room (1)	Inmate Letters/Intake Letters/Inmate Response L	108	216.00
P. Birk	01/30/2025	2.00	2.00	Reviewing, memo'ing, and drafting responses to letters in the EHCC mail room after she left us a voicemail yesterday (2) Updating mass mail spreadsheet to reflect new housing location for class member who was sent to Hunt (1) Scanning and saving envelopes returned as undeliverable; looking up current housing locations online; updating mass mailing spreadsheet to reflect changes to housing (4) Generating cover letters for re-sending returned letters; generating address labels; printing cover letters and labels; prepping envelopes for mailing (4) Generating mail request forms, scanning outgoing letters, and leaving in Front Office for hopeful mailing tomorrow (3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.1)	Inmate Letters/Intake Letters/Inmate Response L	108	540.00
P. Birk	03/10/2025	5.00	5.00	I attempted several calls to the EHCC mail room, to confirm legal mail sent to class members who are now being housed there. Every time the person who answered tried to transfer me to the mail room, the call either dropped, or it rang once and then there was neither more ringing nor anyone on the line (2) Opening and scanning new letters received over the weekend and Monday (4) Naming and moving new letters into weekly intake folder (2) Generating cover letter for sending items to class member who requested them (3) Printing complaint, both decisions, remedial order, and judgment for class member who requested them; mild troubleshooting on copy machine (5) Prepping to mail; scanning; and delivering to Front Office for mailing tomorrow (2) Moving files into appropriate locations based on housing updates (4) Received another voicemail from a class member's mother whom I've been playing "phone tag" with for a couple of weeks; she suggested that I could leave her my email address in a voicemail and she can reach out that way; called back and left her a vm with that info and let her know I will add her to my known contacts so I shouldn't miss her (4) Reviewing and sending extremely long email to Ms. Blackmon to provide her with information about the case, prisons in the state, the ARP process, and the handling of prison or jail intakes with information and referral (1.2) I tried again to call and verify legal mail with Hunt; the mail room direct number rang once and cut out; the main prison phone number rang and rang but no one answered (1) Organizing physical letters in DWCC files closet and cleaning out file cabinet to expand	Mass Mailings	108	324.00
P. Birk	03/13/2025	3.00	3.00			108	378.00
P. Birk	03/25/2025	3.50	3.50			108	270.00
P. Birk	04/01/2025	2.50	2.50			108	270.00
P. Birk	04/02/2025	2.50	2.50				

Detailed Time Entries - Half-Hour Increments							Exhibit 1
Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
				Updating times on documents to remove or add leading numbers; relocating items from "move after data migration" folder to their appropriate places; moving letters from weekly intake folder into individual complainants' folders for folks who were sent responses last week; generating new folders where needed. It was my first time moving things in GoogleDrive, and the process was a little clunky, so it took me a while to ensure everything went to the right place. (1.2)		108	216.00
P. Birk	04/28/2025	4.00	2.00	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.8). [total time reduced by 50%]	Inmate Letters/Intake Letters/Inmate Response L	108	108.00
P. Birk	05/09/2025	1.00	1.00	Meeting with Ms. Bray and Mr. Courson to discuss scheduling order and to-do list (1.0)	Call/Discussion/Meeting - Co-Counsel	108	270.00
P. Birk	05/29/2025	2.50	2.50	Reading over the letter that the Defendants submitted to the 5th Circuit (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.3)	Inmate Letters/Intake Letters/Inmate Response L	108	216.00
				Meeting with Ms. Bray and Mr. Courson to discuss scheduling order and other upcoming items (1.4) Generating outgoing response letters from template; printing letters and enclosures; generating and printing mailing labels; prepping envelopes with ink and postage stamps and labels; stuffing and sealing envelopes; scanning outgoing envelopes and delivering to Front Office for hopeful mailing today (.4)			
P. Birk	06/04/2025	2.00	2.00	Moving items out of weekly intake folder and into individual folders, generating new folders and subfolders where needed; took longer than usual due to working on the laptop without a	Inmate Letters/Intake Letters/Inmate Response L	108	162.00
P. Birk	06/09/2025	1.50	1.50	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder and emails from advocates (1.5)	Inmate Letters/Intake Letters/Inmate Response L	108	108.00
P. Birk	06/16/2025	1.00	1.00	Confirming legal mail to class member who has been moved to Raymond Laborde CC with Lieutenant Dawkins in	Inmate Letters/Intake Letters/Inmate Response L	108	162.00
P. Birk	06/17/2025	1.50	1.50	Opening, scanning, and naming and moving scans of new letters, including very lengthy one (.4)	Inmate Letters/Intake Letters/Inmate Response L	400	1400.00
				Revised and revised motion to substitute declaration (0.3); conferred with Ms. Bray regarding same (0.2); drafting motion for notice plan regarding right of class to object to fee			
D. Courson	08/19/2024	3.50	3.50	motion under Rule 23 (3.0)	Motion for Attorney Fees/Costs	400	800.00
D. Courson	08/20/2024	2.00	2.00	Revising motion for notice plan regarding right of class to object to fee motion under Rule 23 (1.5); meeting with Ms. Bray regarding same (0.5)	Motion for Attorney Fees/Costs	400	600.00
D. Courson	08/23/2024	1.50	1.50	Revised memorandum in support of proposed notice to class members regarding fee issue	Motion for Attorney Fees/Costs	400	1000.00
D. Courson	09/05/2024	2.50	2.50	Calls with inmates (2.2); follow-up conversation with Ms. Bray afterwards (0.3)	Client Communications	400	600.00
				Legal research regarding availability of discovery on fee motions (0.4); drafted letter to opposing counsel replying to their request for discovery (0.9); emailed draft to co-counsel			
D. Courson	09/16/2024	1.50	1.50	with explanation (0.2)	Motion for Attorney Fees/Costs	400	800.00
D. Courson	12/15/2024	2.00	2.00	Drafted opposition to motion to stay appeal	Various Motions	400	200.00
D. Courson	01/06/2025	0.50	0.50	Legal research regarding jurisdictional issues in preparation for status conference with the court	Status Conference	400	2000.00
				Preparing for status conference with Judge Foote (reviewing pleadings and motions) (1.5); meeting with co-counsel to prepare for same (0.5); performing legal research on the jurisdictional issues raised by the court (3.0)			
D. Courson	01/14/2025	5.00	5.00	Prepared for and participated in status conference with Judge Foote	Status Conference	400	1000.00
D. Courson	01/15/2025	2.50	2.50	Reviewed and edited letter to the court	Status Conference	400	600.00
D. Courson	01/28/2025	1.50	1.50	Conferring with Ms. Bray regarding plans for upcoming visit to David Wade, regarding information received regarding witness from first trial, and communications with court	Status Conference	400	200.00
D. Courson	03/10/2025	0.50	0.50	regarding order on case caption (0.4); reviewed court order re Prepared for and participated in status conference with court (1.0); conferred with Ms. Bray regarding same (0.3);	Call/Discussion/Meeting - Co-Counsel	400	600.00
D. Courson	04/23/2025	1.50	1.50	reviewed Fifth Circuit order granting rehearing in Parker case Drafting memorandum in opposition to renewed motion to stay, including legal research for same and revising same	Status Conference	400	2200.00
D. Courson	05/29/2025	5.50	5.50	(5.0); revised response to Defendants' fifth circuit letter (0.5) Conferred with Ms. Bray regarding response to Keith Fernandez regarding motion for site visit(0.4); edited draft response to opposing counsel (0.5) conferred regarding	Various Motions	400	400.00
D. Courson	06/09/2025	1.00	1.00	revisions to motion (0.1)	Various Motions	400	200.00
D. Courson	06/20/2025	1.00	0.50	Reviewing timesheet for write-downs [time reduced by 50%]	Motion for Attorney Fees/Costs	400	400.00
John Adcock	06/05/2025	1.00	1.00	Read / Review: Read over various recent orders and opinions. • Unbilled	Motion for Attorney Fees/Costs	400	400.00
John Adcock	06/06/2025	1.00	1.00	Read / Review: Read over various recent orders and opinions. • Unbilled	Motion for Attorney Fees/Costs	400	400.00
John Adcock	06/12/2025	2.00	2.00	Draft Motion: Draft supplemental fee petition. • Unbilled	Motion for Attorney Fees/Costs	400	800.00
John Adcock	06/13/2025	2.00	2.00	Legal Research: Research fee rates in WDLA. • Unbilled	Motion for Attorney Fees/Costs	400	800.00
John Adcock	06/13/2025	0.50	0.50	Draft Motion: Draft supplemental motion for fees and costs. • Unbilled	Legal Research	400	200.00
John Adcock	06/16/2025	2.00	2.00	Draft Motion: Draft supplemental fee motion. • Unbilled	Motion for Attorney Fees/Costs	400	800.00
John Adcock	06/18/2025	1.50	1.50	Draft Motion: Draft supplemental fee motion. • Unbilled	Motion for Attorney Fees/Costs	400	600.00
John Adcock	06/18/2025	0.50	0.50	Email back and forth with A. Jones re her review of our rates. • Unbilled	Motion for Attorney Fees/Costs	400	200.00
John Adcock	06/24/2025	1.00	1.00	Draft Motion: Put time together, do math to measure cuts to our time to include in brief. • Unbilled	Motion for Attorney Fees/Costs	400	400.00
John Adcock	06/24/2025	0.50	0.50	Draft Motion: Reach out to Adams and Reece attorneys for their updated time, costs. Take a look and put into our hours. • Unbilled	Motion for Attorney Fees/Costs	400	200.00
John Adcock	06/24/2025	0.50	0.50	Preparation: Add up fees, reductions, costs, etc. for motion. • Unbilled	Motion for Attorney Fees/Costs	400	200.00
Total			<u>9,248</u>			Total	\$ 2,777,349
						Less N.Kumar Fees	85,650
						Adjusted Half-Hour Requested Fees	<u>\$ 2,691,699</u>

EXHIBIT 2

Detailed Time Entries - Block Billings

Exhibit 2

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	2/18/2019	4.3	4.3	Drove from New Orleans to Hunt, visit with client JM, drove back to New Orleans	Block Billing	300.00	1,290.00
M. Bray	12/13/2019	1	1	Dropped off Katie, unloaded all boxes at the office, returned rental car to Enterprise	Block Billing	300.00	300.00
M. Bray	4/23/2021	0.9	0.9	Drove to the office, printed depo transcripts and talked with Received JPPTO from Defendants, finalized and PDF'd and emailed Jon and Emma to review before filing. Created a joint witness list, emailed to Keith for approval before filing.	Block Billing	300.00	270.00
M. Bray	12/3/2021	1.2	1.2	Received Keith's approval on all filings. Filed with Court, saved filed docs to Dropbox.	Block Billing	300.00	360.00
M. Bray	12/31/2021	1	1	Drove to the office and dropped off the binders to Jon, found the sleeves for the DVDs and created an index for the binders	Block Billing	300.00	300.00
M. Bray	1/7/2022	3.6	3.6	Working on sorting out subpoenas, set up a pickup with John Tennessee, coordinated with Plum the instructions for him and what she needs to do. Reviewed draft opening statement.	Block Billing	300.00	1,080.00
M. Bray	7/19/2022	1.6	1.6	Reviewing questions for class members DWCC stuff - sent email to Keith about discovery issues. Sent email to Keith to clarify that he is going to re-notice the expert depositions. Reviewing discovery, moving things into Expert folder	Block Billing	300.00	480.00
M. Bray	8/8/2022	1.3	1.3	Drove to office, set up in conference room for Zoom deposition of Gregory Seal. Printed questions, prepared for the deposition	Block Billing	300.00	390.00
M. Bray	8/14/2022	2	2	Drove into the office to print documents needed for depositions for the week	Block Billing	300.00	600.00
M. Bray	1/17/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to file our response to Def objection to the Vera Report	Block Billing	300.00	300.00
M. Bray	1/18/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	300.00
M. Bray	1/19/2023	0.5	0.5	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	150.00
M. Bray	1/20/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	300.00
M. Bray	1/23/2023	0.9	0.9	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	270.00
M. Bray	1/24/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	300.00
M. Bray	1/25/2023	2	2	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	600.00
M. Bray	1/26/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	300.00
M. Bray	1/30/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	300.00
M. Bray	1/31/2023	1.1	1.1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Emailed tentative list of witnesses to be prepared for tomorrow. Reviewed to do list, need to polish lines of questions to prepare for tomorrow	Block Billing	300.00	330.00
M. Bray	2/1/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Reviewed to do list.	Block Billing	300.00	300.00
M. Bray	2/2/2023	1	1	Debrief with Dalton and Plum. Emailed exhibits entered today to court and counsel. Reviewed to do list.	Block Billing	300.00	300.00
M. Bray	2/3/2023	1	1	Finalizing and submitting filings to ECF. Reply on MilL, Reply on Striking Jury Demand	Block Billing	300.00	300.00
J. Trunnell	10/30/2019	1.80	1.80	Edits to mass letter and coronavirus questionnaire.	Block Billing	300.00	540.00
J. Trunnell	4/2/2020	0.90	0.90	Edits to individual record review assignments, call to MB.	Block Billing	300.00	270.00
J. Trunnell	10/6/2020	1.50	1.50	Researching - reading pleadings - catching up on dispute over telephone access to prisoners for confidential attorney phone	Block Billing	250.00	450.00
E. Douglas	4/30/2020	5.1	5.1	Check in after status conference - also checked in about contacting prisoners at Angola MB and JT will review the list of folks that we are requesting a legal call with and adding to it.	Block Billing	250.00	1,275.00
E. Douglas	5/12/2020	0.4	0.4		Block Billing	250.00	100.00

Detailed Time Entries - Block Billings

Exhibit 2

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
E. Douglas	11/24/2020	7.4	7.4	Meeting w/ Mel Meeting w/ Mel, Ron, Katie re: dates for deposition - meeting with Mel and Katie re: discovery plan - call with Keith Fernandez re: dates for compelled 30b6 deposition. - meeting with katie and mel again to finish conversation about discovery plan - purchasing external hard drive - picking up flash drives from Mel	Block Billing	250.00	1,850.00
E. Douglas	5/26/2021	8.0	8	Mediated settlement discussions in Monroe and travel back from Monroe	Block Billing	250.00	2,000.00
E. Douglas	9/8/2021	1.0	1	Call with LJ at Hunt and Follow up meeting with Melanie	Block Billing	250.00	250.00
E. Mueller	5/6/2022	6.1	6.1	Doc Review: Data entry, google meet with Melanie (.2), completed phase I, and continued on phase II.	Block Billing	225.00	1,372.50
E. Mueller	8/18/2022	7.5	7.5	DWCC - Doct Review - Finished 14R (proofed) and 21R (proofed); Started Review and Data Entry for RFP 23R - LDPSC Regs and Forms - via PDF files in Def3-3rd Supp	Block Billing	225.00	1,687.50
P. Birk	3/14/2024	0.8	0.8	Reading motion to supplement the record and admit evidence of current conditions; reading memo in support of motion; reading declaration of Warden Dauzat	Block Billing	108.00	86.40
Dalton Censor	3/15/2024	1.0	1.0	Revised draft response to opposing counsel regarding P&A access authority and David Wade; reviewing settlement	Block Billing	400.00	400.00
Bruce Hamilton	8/10/2020	7.33	7.33	Depositions of Smith and LeBlanc	Block Billing	400.00	2,932.00
Katie Schwartz	2/18/2019	4.98	4.98	travel and client meeting, meeting with Melanie Bray, mapping responses to pleadings defendants filed Friday	Block Billing	400.00	1,992.00
Katie Schwartz	1/13/2020	8	8	Taking depo of Jesse Jimerson, travel to and from wade	Block Billing	400.00	3,200.00
Katie Schwartz	3/2/2020	5.7	5.7	Travel to DWCC w JT, mapping upcoming depositions	Block Billing	400.00	2,280.00
Katie Schwartz	1/7/2022	10	10	law student prep, meeting w ED, edits to lines of questioning and oral presentations	Block Billing	400.00	4,000.00
		Total	107.91				
						Total	\$ 33,805.40
						Less half-hour increments	16,237.50
						Adjusted Block Billing Requested Fees	\$ 17,567.90

EXHIBIT 3

Detailed Time Entries - Incomplete Time Entry

Exhibit 3

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	2/25/2022	0.7	0.7	Meeting with Gabby to touch base, counsel about Reviewed opposition memorandum filed by Defendants regarding motion for	Incomplete time entry	300.00	210.00
Dalton Courson	6/17/2022	0.3	0.3	Telecom with AC re TRO,	Incomplete time entry	400.00	120.00
Bruce Hamilton	1/31/2019	0.23	0.23	troubleshoot Fil	Incomplete time entry	400.00	92.00
Bruce Hamilton	2/6/2019	0.04	0.04	Review e-mail exchanges regarding Defen	Incomplete time entry	400.00	16.00
Bruce Hamilton	2/10/2019	0.71	0.71	Review/revise opp. to request to contact cla	Incomplete time entry	400.00	284.00
Bruce Hamilton	2/18/2019	0.6	0.6	Review Opp. to Defs' Second Motion to Co	Incomplete time entry	400.00	240.00
Bruce Hamilton	3/1/2019	0.3	0.3	Review Supp. Opp. to Def. Motion to App	Incomplete time entry	400.00	120.00
Bruce Hamilton	3/8/2019	0.14	0.14	Review judge's ruling on motion to approve	Incomplete time entry	400.00	56.00
Bruce Hamilton	8/5/2019	0.33	0.33	Complete "Request for Certificate" form, p:	Incomplete time entry	400.00	132.00
Bruce Hamilton	9/2/2019	0.1	0.1	Review e-mail exchange JT/RR re: visit to	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/3/2019	0.2	0.2	Review e-mail exchange JT/KS/RL re: mee	Incomplete time entry	400.00	80.00
Bruce Hamilton	9/4/2019	0.1	0.1	Review e-mail exchange MM/JT/KS re: me	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/4/2019	0.1	0.1	Review e-mail exchange KS/JT re: propose	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/5/2019	0.1	0.1	Review JT e-mails re: letters, visit to DWCC	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/7/2019	0.1	0.1	Review RR e-mail w/def response to propo	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/10/2019	0.1	0.1	Review e-mail exchange MB/JT re: meet an	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/11/2019	0.1	0.1	Review e-mail exchange KS/MB/JT/MB re	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/11/2019	0.1	0.1	Review e-mail exchange MB/RR meet and	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/12/2019	0.1	0.1	Review e-mail exchange KS/JT/KS/JT re: D	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/12/2019	0.1	0.1	Review e-mail KF re: meet and confer	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/13/2019	0.62	0.62	Review Opposition to Motion for Mental E	Incomplete time entry	400.00	248.00
Bruce Hamilton	9/13/2019	0.1	0.1	Exchange e-mails with KS re: intake (conf	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/16/2019	0.1	0.1	Review e-mail exchange Kathy Burns Hill/	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/17/2019	0.1	0.1	Review e-mail exchange JT/Craig Haney/J	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/18/2019	0.1	0.1	Review e-mail exchange JT/Mercedes Mon	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/19/2019	2.35	2.35	Meeting at AC w/JT, MB, KS and interns,	Incomplete time entry	400.00	940.00
Bruce Hamilton	9/19/2019	0.1	0.1	Review e-mail exchange MB/MB re: Court	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/20/2019	0.1	0.1	Review e-mail exchange KS/MB/KS/MB/r	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/20/2019	0.1	0.1	Review e-mail exchange KS/MB/KS re: Fil	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/20/2019	0.1	0.1	Review e-mail exchange Janac Torrence/M	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/20/2019	0.1	0.1	Review e-mail exchange JT/experts re: logi	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/20/2019	0.1	0.1	Review e-mail exchange MB/KS/MB/KS/M	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/20/2019	0.1	0.1	Review e-mail exchange JT/KS re: problem	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/23/2019	0.1	0.1	Review e-mail exchange KBH/KS re: logis	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/23/2019	0.2	0.2	Review e-mail exchange RR/KS/MB/JT/KS	Incomplete time entry	400.00	80.00
Bruce Hamilton	9/24/2019	0.23	0.23	Review briefing in Angola case excluding	Incomplete time entry	400.00	92.00
Bruce Hamilton	9/24/2019	0.71	0.71	Review and revise MIL draft excluding po	Incomplete time entry	400.00	284.00
Bruce Hamilton	9/24/2019	0.1	0.1	Review e-mail exchange JT/KS/MB re: dep	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/24/2019	0.1	0.1	Review e-mail exchange JT/RR/RR/RR/KS/	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/24/2019	0.1	0.1	Review e-mail exchange JT/KS re: photogr	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/24/2019	0.1	0.1	Review e-mail exchange JT/RR re: expert s	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/24/2019	0.1	0.1	Review e-mail exchange JT/MB/KS re: mee	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/25/2019	0.1	0.1	Review e-mail exchange JT/RR/JT expert s	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/25/2019	0.1	0.1	E-mail exchange JT, response re: time for	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/26/2019	1.13	1.13	Meeting at AC with clerks to review discov	Incomplete time entry	400.00	452.00
Bruce Hamilton	9/26/2019	0.1	0.1	Review MB proposed e-mail to Dan with li	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/26/2019	0.1	0.1	Review RR e-mail re: expert site visit notic<	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/26/2019	0.42	0.42	Review MIL briefing and research cited ca	Incomplete time entry	400.00	168.00

Detailed Time Entries - Incomplete Time Entry

Exhibit 3

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Bruce Hamilton	9/26/2019	1.32	1.32	Draft MIL to exclude post-discovery cond:	Incomplete time entry	400.00	528.00
Bruce Hamilton	9/30/2019	0.65	0.65	Status conference with magistrate judge ab	Incomplete time entry	400.00	260.00
Bruce Hamilton	9/30/2019	0.15	0.15	Discuss strategy/next steps with AC's JT/MJ	Incomplete time entry	400.00	60.00
Bruce Hamilton	9/30/2019	0.1	0.1	Review e-mail from expert KBH re: logistii	Incomplete time entry	400.00	40.00
Bruce Hamilton	9/30/2019	0.1	0.1	Review MB e-mail, responses KS/MB/JT/K	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/1/2019	0.1	0.1	Review KS e-mail re: site visit order limitin	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/1/2019	0.1	0.1	Review JT draft e-mail to defendants re: cl	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/1/2019	0.1	0.1	Review KS e-mail/JT response re: MIL and	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/2/2019	0.1	0.1	Review KS e-mail and spreadsheet re: vide	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/2/2019	0.1	0.1	Review JT e-mail re: MIL, revisions/KS res	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/2/2019	0.25	0.25	Review and revise motion to strike jury de	Incomplete time entry	400.00	100.00
Bruce Hamilton	10/3/2019	0.1	0.1	Review RR e-mail re: photography and ros	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/3/2019	0.1	0.1	Review MB e-mail re: depo of ED Chris, K	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/3/2019	0.1	0.1	Review JT e-mail re: meet and confer follo	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/4/2019	0.1	0.1	Review JT e-mail re: depo availability, KS/	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/14/2019	0.13	0.13	Review JT e-mail re: objection to depo not	Incomplete time entry	400.00	52.00
Bruce Hamilton	10/14/2019	0.1	0.1	Review JT e-mail follow up on meet and c	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/14/2019	0.1	0.1	Review JT e-mail re: proposed litserv ques'	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/14/2019	0.1	0.1	Review JT e-mail re: Pacholke document le	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/14/2019	0.1	0.1	Review JT e-mail re: case update letter, rev	Incomplete time entry	400.00	40.00
Bruce Hamilton	10/17/2019	0.18	0.18	Review Magistrate's order on motion for m	Incomplete time entry	400.00	72.00
Bruce Hamilton	10/17/2019	0.17	0.17	Draft notice of objection to magistrate's rul	Incomplete time entry	400.00	68.00
Bruce Hamilton	10/21/2019	4.84	4.84	Draft Appeal of Magistrate's Order on Mot	Incomplete time entry	400.00	1,936.00
Bruce Hamilton	10/29/2019	0.43	0.43	Review/revise Pls' reply to Defs' Opp to Pls	Incomplete time entry	400.00	172.00
Bruce Hamilton	10/29/2019	0.03	0.03	Review magistrate judge's order re: settlem	Incomplete time entry	400.00	12.00
Bruce Hamilton	10/29/2019	0.24	0.24	Review/revise Pls' reply to Defs' Opp to MI	Incomplete time entry	400.00	96.00
Bruce Hamilton	10/31/2019	0.53	0.53	Review and revise appeal to mental exam r	Incomplete time entry	400.00	212.00
Bruce Hamilton	11/4/2019	0.1	0.1	Review/respond to inquiry from KS re: inh	Incomplete time entry	400.00	40.00
Bruce Hamilton	11/4/2019	0.24	0.24	Review case law on sanctions--inherent po	Incomplete time entry	400.00	96.00
Bruce Hamilton	11/15/2019	0.17	0.17	Call with JT re: video conference, motion f	Incomplete time entry	400.00	68.00
Bruce Hamilton	11/22/2019	0.28	0.28	Track names of short-term DWCC employee	Incomplete time entry	400.00	112.00
Bruce Hamilton	11/26/2019	0.36	0.36	Review and revise surreply to Defs' opp. to	Incomplete time entry	400.00	144.00
Bruce Hamilton	12/3/2019	0.18	0.18	Review Defs' opposition to motion for sanc	Incomplete time entry	400.00	72.00
Bruce Hamilton	12/4/2019	0.02	0.02	Review local rules re: sending magistrate c	Incomplete time entry	400.00	8.00
Bruce Hamilton	12/4/2019	0.23	0.23	Print out courtesy copies, draft letter, and p	Incomplete time entry	400.00	92.00
Bruce Hamilton	12/4/2019	0.41	0.41	Review motion for sanctions, opp. to motio	Incomplete time entry	400.00	164.00
Bruce Hamilton	12/18/2019	0.29	0.29	Review draft of Pl's appeal of magistrate ju	Incomplete time entry	400.00	116.00
Bruce Hamilton	12/31/2019	1.2	1.2	Review draft opposition to Defs' motion to	Incomplete time entry	400.00	480.00
Bruce Hamilton	1/8/2020	0.11	0.11	Review court order re: supplemental briefi	Incomplete time entry	400.00	44.00
Bruce Hamilton	1/8/2020	1.67	1.67	Research caselaw on standing/mootness for	Incomplete time entry	400.00	668.00
Bruce Hamilton	1/8/2020	1.97	1.97	Draft supplemental brief on mootness w/t/t	Incomplete time entry	400.00	788.00
Bruce Hamilton	1/8/2020	0.36	0.36	Review docket and previous class-certificat	Incomplete time entry	400.00	144.00
Bruce Hamilton	1/14/2020	0.48	0.48	Review Defs' Reply to Opp. to motion to c	Incomplete time entry	400.00	192.00
Bruce Hamilton	1/30/2020	0.4	0.4	Review reply to defs' opp. to supp. memo r	Incomplete time entry	400.00	160.00
Bruce Hamilton	1/30/2020	0.65	0.65	Meet with J. Trunnell re: upcoming deposi	Incomplete time entry	400.00	260.00
Bruce Hamilton	1/31/2020	0.17	0.17	Review motion for leave to file reply, reply	Incomplete time entry	400.00	68.00
Bruce Hamilton	2/3/2020	0.47	0.47	Review judge's scheduling orders, case hist	Incomplete time entry	400.00	188.00
Bruce Hamilton	2/7/2020	0.63	0.63	Revise Motion to Compel (adding certifica	Incomplete time entry	400.00	252.00
Bruce Hamilton	2/12/2020	0.12	0.12	Review rulings on motion to exclude post-	Incomplete time entry	400.00	48.00

Detailed Time Entries - Incomplete Time Entry

Exhibit 3

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Bruce Hamilton	2/18/2020	5.2	5.2	Defend depositions of Montgomery, Dotso	Incomplete time entry	400.00	2,080.00
Bruce Hamilton	2/19/2020	3.8	3.8	Defend depositions of Brooks, Dowell, Ru	Incomplete time entry	400.00	1,520.00
Bruce Hamilton	2/20/2020	2.03	2.03	Defend depositions of C. Turner and M. M	Incomplete time entry	400.00	812.00
Bruce Hamilton	2/26/2020	0.1	0.1	Review Magistrate's Order on Defendants' f	Incomplete time entry	400.00	40.00
Bruce Hamilton	2/27/2020	1.5	1.5	Weekly meeting to discuss case status, strat	Incomplete time entry	400.00	600.00
Bruce Hamilton	2/27/2020	0.02	0.02	Review Judge Foote's order denying appea	Incomplete time entry	400.00	8.00
Bruce Hamilton	3/11/2020	0.22	0.22	Review brief in opposition to defs' MTC 3	Incomplete time entry	400.00	88.00
Bruce Hamilton	3/26/2020	0.88	0.88	Meeting over Zoom to discuss deposition o	Incomplete time entry	400.00	352.00
Bruce Hamilton	5/12/2020	0.77	0.77	Review and revise MIL to exclude post-dis	Incomplete time entry	400.00	308.00
Bruce Hamilton	5/12/2020	0.93	0.93	Review and revise MIL to exclude post-dis	Incomplete time entry	400.00	372.00
Bruce Hamilton	6/18/2020	1.1	1.1	Review Defendants' opposition and Plamtii	Incomplete time entry	400.00	440.00
Bruce Hamilton	6/30/2020	8.25	8.25	30(b)(6) deposition of Disability Rights Lo	Incomplete time entry	400.00	3,300.00
Bruce Hamilton	7/2/2020	0.92	0.92	Meeting to discuss 30(b)(6) and next steps,	Incomplete time entry	400.00	368.00
Bruce Hamilton	7/8/2020	1.95	1.95	Team meeting re: protective order, deposit	Incomplete time entry	400.00	780.00
Bruce Hamilton	7/13/2020	1.05	1.05	Revise Memo iso Motion for Protective Or	Incomplete time entry	400.00	420.00
Bruce Hamilton	7/13/2020	0.62	0.62	Team meeting to discuss Protective Order b	Incomplete time entry	400.00	248.00
Bruce Hamilton	7/16/2020	1.03	1.03	Team meeting re: MTC, discovery/doc rev	Incomplete time entry	400.00	412.00
Bruce Hamilton	7/21/2020	1.03	1.03	Document review--first pass of Dotson rec	Incomplete time entry	400.00	412.00
Bruce Hamilton	8/5/2020	0.58	0.58	Review reply to Opp to motion for protecti	Incomplete time entry	400.00	232.00
Bruce Hamilton	8/8/2020	0.53	0.53	Review Le Blanc deposition questions draf	Incomplete time entry	400.00	212.00
Bruce Hamilton	8/9/2020	2	2	Review, download, and summarize key U	Incomplete time entry	400.00	800.00
Bruce Hamilton	8/19/2020	0.5	0.5	Document review (Shawn Francis), identif	Incomplete time entry	400.00	200.00
Bruce Hamilton	8/21/2020	0.62	0.62	Review/edit draft sur-reply in support of o	Incomplete time entry	400.00	248.00
Bruce Hamilton	8/23/2020	0.8	0.8	Draft co-counseling agreement for Cohen M	Incomplete time entry	400.00	320.00
Bruce Hamilton	8/24/2020	2.28	2.28	Download and review documents for/of Fr	Incomplete time entry	400.00	912.00
Bruce Hamilton	8/25/2020	0.2	0.2	Review draft co-counseling agreements w/I	Incomplete time entry	400.00	80.00
Bruce Hamilton	8/26/2020	2	2	Review and upload Master Prison files of S	Incomplete time entry	400.00	800.00
Bruce Hamilton	8/31/2020	1	1	Download and review 1 documents for Shaw	Incomplete time entry	400.00	400.00
Bruce Hamilton	9/2/2020	2.5	2.5	Upload/review batch of Shawn Francis rec	Incomplete time entry	400.00	1,000.00
Bruce Hamilton	9/3/2020	3.25	3.25	Review/upload Shawn Francis documents l	Incomplete time entry	400.00	1,300.00
Bruce Hamilton	10/6/2020	1.51	1.51	Review and edit appeal of magistrate's orde	Incomplete time entry	400.00	604.00
Bruce Hamilton	10/7/2020	1	1	Review doc-review assignments, cross-refe	Incomplete time entry	400.00	400.00
Bruce Hamilton	11/4/2020	0.1	0.1	Talk to Cohen Millstein about co-counselin	Incomplete time entry	400.00	40.00
Bruce Hamilton	11/6/2020	1.5	1.5	Team meeting re: lead counsel, discovery a	Incomplete time entry	400.00	600.00
Bruce Hamilton	12/1/2020	4	4	Review, code, and summarize Shawn Frani	Incomplete time entry	400.00	1,600.00
Bruce Hamilton	12/2/2020	4	4	Review, code, and summarize Shawn Frani	Incomplete time entry	400.00	1,600.00
Bruce Hamilton	12/3/2020	5.2	5.2	Review, code, and summarize Darius Holli	Incomplete time entry	400.00	2,080.00
Bruce Hamilton	12/5/2020	2.5	2.5	Review newly uploaded docs for A. Caro a	Incomplete time entry	400.00	1,000.00
Bruce Hamilton	12/21/2020	0.8	0.8	Review and tag docs for Bryant Wilson, Ti	Incomplete time entry	400.00	320.00
Bruce Hamilton	12/21/2020	2.22	2.22	Review and tag/code Jesse Sullivan docum	Incomplete time entry	400.00	888.00
Bruce Hamilton	12/23/2020	2	2	Review and tag/code Jesse Sullivan docum	Incomplete time entry	400.00	800.00
Bruce Hamilton	12/29/2020	3	3	Review, tag, and summarize Jesse Sullivan	Incomplete time entry	400.00	1,200.00
Bruce Hamilton	12/30/2020	3	3	Review, tag, and summarize Jesse Sullivan	Incomplete time entry	400.00	1,200.00
Bruce Hamilton	12/31/2020	3	3	Review, tag, and summarize Jesse Sullivan	Incomplete time entry	400.00	1,200.00
Bruce Hamilton	1/1/2021	1.5	1.5	Review, tag, and summarize Jesse Sullivan	Incomplete time entry	400.00	600.00
Bruce Hamilton	1/2/2021	2	2	Review, tag, and summarize Jesse Sullivan	Incomplete time entry	400.00	800.00
Bruce Hamilton	1/4/2021	2.05	2.05	Review/revise/comment on Hainey declara	Incomplete time entry	400.00	820.00
Bruce Hamilton	1/7/2021	1	1	Research discovery obligation w/r/t draft ex	Incomplete time entry	400.00	400.00
Bruce Hamilton	1/13/2021	0.5	0.5	Team meeting to discuss JT's role/assignme	Incomplete time entry	400.00	200.00

Detailed Time Entries - Incomplete Time Entry

Exhibit 3

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Bruce Hamilton	1/14/2021	1.18	1.18	Review spreadsheet of client documents; re	Incomplete time entry	400.00	472.00
Bruce Hamilton	1/14/2021	0.5	0.5	Team meeting with JT to discuss his work p	Incomplete time entry	400.00	200.00
Bruce Hamilton	1/15/2021	2	2	Review more uploaded docs for Vincent D	Incomplete time entry	400.00	800.00
Bruce Hamilton	1/20/2021	3	3	Review uploaded documents for Theron N	Incomplete time entry	400.00	1,200.00
Bruce Hamilton	1/29/2021	1	1	Continue Theron Nelson doc review (made	Incomplete time entry	400.00	400.00
Bruce Hamilton	1/31/2021	2	2	Continue Theron Nelson doc review. Made	Incomplete time entry	400.00	800.00
Bruce Hamilton	2/1/2021	1.5	1.5	Continue Theron Nelson doc review. Made	Incomplete time entry	400.00	600.00
Bruce Hamilton	2/2/2021	2	2	Continue Theron Nelson doc review. Got t	Incomplete time entry	400.00	800.00
Bruce Hamilton	2/2/2021	0.5	0.5	Review K. Burns expert materials (reports,	Incomplete time entry	400.00	200.00
Bruce Hamilton	2/3/2021	1	1	Review Burns expert materials from Dunn	Incomplete time entry	400.00	400.00
Bruce Hamilton	2/4/2021	2	2	Review Burns' expert materials (reports in	Incomplete time entry	400.00	800.00
Bruce Hamilton	2/5/2021	2.5	2.5	Review Burns' expert publications, expert reports	Incomplete time entry	400.00	1,000.00
Bruce Hamilton	2/6/2021	1.5	1.5	Review Burns expert materials in Arapio ca	Incomplete time entry	400.00	600.00
Bruce Hamilton	2/7/2021	2	2	Continue Shawn Francis doc review (to #6	Incomplete time entry	400.00	800.00
Bruce Hamilton	2/17/2021	2.5	2.5	Continue doc review for S Francis (to #11	Incomplete time entry	400.00	1,000.00
Bruce Hamilton	2/19/2021	1	1	Continue Shawn Francis doc review (1250	Incomplete time entry	400.00	400.00
Bruce Hamilton	2/22/2021	2.5	2.5	Review deposition transcripts of Vasallo an	Incomplete time entry	400.00	1,000.00
Bruce Hamilton	3/2/2021	1	1	Review expert materials for Dr. Sanket Vya	Incomplete time entry	400.00	400.00
Bruce Hamilton	3/9/2021	1	1	Team meeting re: doc review and Ds' expe	Incomplete time entry	400.00	400.00
Bruce Hamilton	3/15/2021	0.5	0.5	Review doc review assignments and progre	Incomplete time entry	400.00	200.00
Bruce Hamilton	3/16/2021	1.5	1.5	Review D's expert report (Thompson) and	Incomplete time entry	400.00	600.00
Bruce Hamilton	3/17/2021	2.5	2.5	Doc review (Theron Nelson), remaining ba	Incomplete time entry	400.00	1,000.00
Bruce Hamilton	3/24/2021	1	1	Prepare for deposition by reviewing object	Incomplete time entry	400.00	400.00
Bruce Hamilton	3/25/2021	1.5	1.5	Review/revise motion to expedite and moti	Incomplete time entry	400.00	600.00
Bruce Hamilton	4/15/2021	0.08	0.08	Review deposition review assignments and	Incomplete time entry	400.00	32.00
Bruce Hamilton	4/28/2021	1.25	1.25	Review/revise Supplemental Class Cert	Incomplete time entry	400.00	500.00
Bruce Hamilton	5/6/2021	0.4	0.4	Draft, revise, finalize declaration in suppor	Incomplete time entry	400.00	160.00
Bruce Hamilton	5/13/2021	0.75	0.75	Review/cite check and copy edit Daubert O	Incomplete time entry	400.00	300.00
Bruce Hamilton	5/14/2021	1	1	Doc review: Troy Tennessee and Timothy	Incomplete time entry	400.00	400.00
Bruce Hamilton	5/25/2021	6.5	6.5	Review Dabert filings, research, and draft	Incomplete time entry	400.00	2,600.00
Total		169.44				Total	\$ 67,706.00
Less half-hour increments							33,000.00
Adjusted Incomplete Entries Requested Fees							\$ 34,706.00

EXHIBIT 4

Detailed Time Entries - Vague Entries

Exhibit 4

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
M. Bray	8/17/2018	0.1	0.1	Discussed upcoming conference call with Sara	Vague	300.00	30.00
M. Bray	8/29/2018	0.1	0.1	Emailed Amy Pirtle.	Vague	300.00	30.00
M. Bray	9/10/2018	0.2	0.2	Received response from Jon, forwarded to Katie	Vague	300.00	60.00
				Received several emails re. DWCC work and things being			
M. Bray	9/17/2018	0.4	0.4	reviewed.	Vague	300.00	120.00
M. Bray	10/1/2018	0.7	0.7	Discussed JT with Laura. Read emails re. DWCC	Vague	300.00	210.00
M. Bray	11/13/2018	0.1	0.1	Katie sent an email re. DWCC. I replied	Vague	300.00	30.00
M. Bray	3/26/2019	0.1	0.1	Tried to call EH re. RH. No answer and no voicemail	Vague	300.00	30.00
				Spoke with the CO P&A about their case. I will send him a copy			
M. Bray	6/20/2019	0.5	0.5	of our complaint for DWCC and he will send us their settlement	Vague	300.00	150.00
M. Bray	8/1/2019	0.4	0.4	Discussed things with Angela	Vague	300.00	120.00
				Client RB wrote that he wants us to return an original document to			
				him. Looked through Dropbox as well as they physical letters,			
				unable to locate the original document he's requesting. Will ask			
M. Bray	9/4/2019	0.5	0.5	him about it on Friday when we meet with him.	Vague	300.00	150.00
M. Bray	11/19/2019	0.6	0.6	DWCC stuff	Vague	300.00	180.00
M. Bray	11/21/2019	3.9	3.9	DWCC stuff	Vague	300.00	1,170.00
M. Bray	11/22/2019	0.6	0.6	DWCC	Vague	300.00	180.00
				Discussed progress with Morgan, she will let me know as soon as			
M. Bray	11/25/2019	0.4	0.4	some packets are ready to print	Vague	300.00	120.00
M. Bray	2/11/2021	0.4	0.4	Received a voicemail forwarded from Vincenzo, returned the call.	Vague	300.00	120.00
M. Bray	7/27/2021	0.5	0.5	Call with Katie	Vague	300.00	150.00
				Had a call with Jon and discussed some things before the phone			
M. Bray	8/16/2021	0.2	0.2	conference today	Vague	300.00	60.00
M. Bray	9/17/2021	0.1	0.1	Received a call from Randy Robert	Vague	300.00	30.00
M. Bray	9/30/2021	0.4	0.4	Discussion among Emma and Jon and I	Vague	300.00	120.00
M. Bray	12/30/2021	0.3	0.3	Had a call with JR.	Vague	300.00	90.00
M. Bray	1/3/2022	4.1	4.1	Reviewing documents and drafting questions	Vague	300.00	1,230.00
M. Bray	1/4/2022	0.2	0.2	Follow up call with Connell and Emma	Vague	300.00	60.00
M. Bray	4/29/2022	0.5	0.5	Meeting with Gabby	Vague	300.00	150.00
M. Bray	5/13/2022	0.6	0.6	Meeting with Gabby	Vague	300.00	180.00
M. Bray	6/15/2022	0.3	0.3	Meet and confer with Keith	Vague	300.00	90.00
M. Bray	10/17/2022	0.2	0.2	Had a call with Dalton	Vague	300.00	60.00
M. Bray	10/17/2022	0.2	0.2	Received a follow up call from Dalton	Vague	300.00	60.00
M. Bray	10/18/2022	0.5	0.5	Met with Dalton and Plum	Vague	300.00	150.00
M. Bray	10/18/2022	2.2	2.2	Met with Dalton and Plum later in the day	Vague	300.00	660.00
M. Bray	11/8/2022	0.3	0.3	Spoke briefly with Dalton	Vague	300.00	90.00
M. Bray	11/13/2022	0.3	0.3	Received a call from Ron.	Vague	300.00	90.00
M. Bray	11/16/2022	0.2	0.2	Call with Dalton to fill him in on my call with Craig	Vague	300.00	60.00
M. Bray	11/27/2022	0.1	0.1	Sent an email to Dalton	Vague	300.00	30.00
M. Bray	12/3/2022	0.1	0.1	Replied to an email from Dalton.	Vague	300.00	30.00
M. Bray	12/5/2022	0.4	0.4	Call with Dalton	Vague	300.00	120.00
M. Bray	12/6/2022	0.2	0.2	Received an email from Plum.	Vague	300.00	60.00
M. Bray	12/7/2022	0.9	0.9	Talked with Dalton	Vague	300.00	270.00
M. Bray	12/12/2022	1.8	1.8	Met with Dalton	Vague	300.00	540.00
M. Bray	12/14/2022	0.7	0.7	Call with Dalton	Vague	300.00	210.00
M. Bray	12/22/2022	0.3	0.3	Call with Dalton	Vague	300.00	90.00
M. Bray	12/22/2022	0.3	0.3	Call with Dalton.	Vague	300.00	90.00
M. Bray	1/2/2023	0.8	0.8	Call with Dalton	Vague	300.00	240.00
M. Bray	1/2/2023	1	1	Call with Dalton to discuss.	Vague	300.00	300.00
M. Bray	1/3/2023	0.8	0.8	Call with Dalton	Vague	300.00	240.00
M. Bray	1/5/2023	0.4	0.4	Call with Plum	Vague	300.00	120.00
M. Bray	1/13/2023	0.3	0.3	Call with Dalton	Vague	300.00	90.00
M. Bray	1/15/2023	0.4	0.4	Call with Dalton	Vague	300.00	120.00
M. Bray	7/3/2023	0.5	0.5	Call with Dalton	Vague	300.00	150.00
M. Bray	7/11/2023	0.2	0.2	Emailed Dalton	Vague	300.00	60.00
M. Bray	9/18/2023	0.4	0.4	Call with Dalton	Vague	300.00	120.00
M. Bray	3/26/2024	2.3	2.3	Met with Dalton to discuss	Vague	300.00	690.00
				Review of edits by MB and SV, responding to comments,			
J. Trunnell	3/20/2018	2.50	2.50	forwarding draft to Ron.	Vague	300.00	750.00
J. Trunnell	3/29/2018	0.10	0.10	Call to Jim Craig	Vague	300.00	30.00
J. Trunnell	6/22/2018	0.20	0.20	Call to Mikey.	Vague	300.00	60.00
J. Trunnell	8/27/2018	1.00	1.00	6-7 debrief and meeting	Vague	300.00	300.00
J. Trunnell	12/1/2018	3.00	3.00	Attending PAIMI council meeting.	Vague	300.00	900.00
J. Trunnell	3/7/2019	0.10	0.10	Call to Katie and Bruce	Vague	300.00	30.00
J. Trunnell	3/21/2019	1.80	1.80	Review of correspondence.	Vague	300.00	540.00
J. Trunnell	6/17/2019	1.20	1.20	Review of correspondence and memos.	Vague	300.00	360.00
J. Trunnell	7/15/2019	1.80	1.80	Review of memos and letters.	Vague	300.00	540.00
J. Trunnell	10/9/2019	0.30	0.30	Meeting and instructions for inventory with Jamie.	Vague	300.00	90.00
J. Trunnell	11/14/2019	1.50	1.50	Post meeting drafting memo on list.	Vague	300.00	450.00
J. Trunnell	11/22/2019	0.80	0.80	Call to Craig	Vague	300.00	240.00
J. Trunnell	1/9/2020	1.50	1.50	Review of D's filings.	Vague	300.00	450.00

Detailed Time Entries - Vague Entries

Exhibit 4

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
J. Trunnell	1/14/2020	2.80	2.80	Read and signs	Vague	300.00	840.00
J. Trunnell	2/26/2020	1.80	1.80	Definition of SMI discussion.	Vague	300.00	540.00
J. Trunnell	5/7/2020	0.40	0.40	Logistics and coordinating next meeting.	Vague	300.00	120.00
J. Trunnell	5/20/2020	0.80	0.80	Call to Bowman	Vague	300.00	240.00
J. Trunnell	7/1/2020	1.00	1.00	Check in with Katie.	Vague	300.00	300.00
J. Trunnell	9/23/2020	2.70	2.70	Meeting with MB and ELD Email regarding letter about adequacy of counsel in unrelated civil case. Clarified that writer was dissatisfied with his previous attorney and was forwarding letters to us in hope that we would	Vague	300.00	810.00
J. Trunnell	1/26/2021	0.50	0.50	take over rep.	Vague	300.00	150.00
J. Trunnell	3/11/2021	1.80	1.80	Call with Harvey	Vague	300.00	540.00
J. Trunnell	3/13/2021	0.70	0.70	Call to Harvey	Vague	300.00	210.00
J. Trunnell	3/14/2021	0.80	0.80	Call to Harvey	Vague	300.00	240.00
J. Trunnell	3/18/2021	0.80	0.80	Call to Harvey	Vague	300.00	240.00
J. Trunnell	3/19/2021	0.30	0.30	Call with ELD.	Vague	300.00	90.00
J. Trunnell	6/9/2021	0.80	0.80	Call to Larry Jones.	Vague	300.00	240.00
J. Trunnell	6/16/2021	1.00	1.00	Call to Ronald Brooks.	Vague	300.00	300.00
J. Trunnell	6/16/2021	0.60	0.60	Call with Melanie and Katie.	Vague	300.00	180.00
J. Trunnell	6/17/2021	0.70	0.70	Call to Mikey.	Vague	300.00	210.00
J. Trunnell	6/29/2021	1.00	1.00	Call with Fathi	Vague	300.00	300.00
J. Trunnell	7/23/2021	6.00	6.00	Courtesy copies printed and organized and tabbed.	Vague	300.00	1,800.00
J. Trunnell	7/25/2021	1.00	1.00	Call with Mikey	Vague	300.00	300.00
J. Trunnell	9/2/2021	0.50	0.50	Call to M Snider	Vague	300.00	150.00
J. Trunnell	12/17/2021	1.10	1.10	Review of Estelle.	Vague	300.00	330.00
J. Trunnell	4/6/2022	0.50	0.50	Call to MJC.	Vague	300.00	150.00
E. Douglas	1/21/2021	0.8	0.8	Meeting w/ Jon re: updates (.8)	Vague	250.00	200.00
E. Douglas	2/18/2021	0.4	0.4	Meeting with Melanie (.4)	Vague	250.00	100.00
E. Douglas	4/8/2021	1.8	1.8	Meeting with Mel (1.8)	Vague	250.00	450.00
E. Douglas	6/9/2021	1.0		/ Video conference with L. J (1) / Drafting memo re: video	Vague	250.00	250.00
E. Douglas	9/9/2021	1.3	1.3	1 conferences	Vague	250.00	325.00
E. Douglas	10/18/2021	1.0	1.0	Call with CT (1.3)	Vague	250.00	250.00
E. Douglas	11/30/2021	0.7	0.7	1 Meeting with PJI and Melanie (1)	Vague	250.00	175.00
E. Douglas	11/30/2021	0.7	0.7	Calling DB - (.7)	Vague	250.00	175.00
E. Douglas	12/6/2021	0.4	0.4	Call with LJ (.7)	Vague	250.00	100.00
R. Lospennato	1/30/2019	0.2	0.2	Check in with Melanie (.4)	Vague	400.00	80.00
R. Lospennato	12/13/2021	0.3	0.3	Follow-up meeting with Jon regarding meeting yesterday	Vague	400.00	120.00
E. Mueller	6/27/2022	2	2	Call with Katie	Vague	225.00	450.00
E. Mueller	7/6/2022	0.1	0.1	Conferring with Melanie and Dalton	Vague	225.00	22.50
P. Birk	9/27/2022	0.3	0.3	Call with Dalton	Vague	108.00	32.40
P. Birk	11/16/2022	0.3	0.3	Saving and renaming new scans (.3)	Vague	108.00	32.40
P. Birk	12/1/2022	0.3	0.3	Drafting email re: referrals for WG (.3)	Vague	108.00	32.40
P. Birk	5/25/2023	0.2	0.2	Discussing SSA question with LK	Vague	108.00	21.60
P. Birk	6/28/2023	0.2	0.2	Reviewing voicemail forwarded by front desk and planning	Vague	108.00	21.60
P. Birk	7/18/2023	0.2	0.2	callback response	Vague	108.00	21.60
P. Birk	10/9/2023	3.5	3.5	Scanning and saving new letter (.2)	Vague	108.00	378.00
P. Birk	10/16/2023	0.1	0.1	Continuing to review, memo, and draft responses later in the day (3.5)	Vague	108.00	10.80
P. Birk	12/8/2023	0.3	0.3	Attempting to return call; leaving voicemail (.1)	Vague	108.00	32.40
P. Birk	6/4/2024	0.5	0.5	Mild tidying in DWCC file closet; didn't have a chance to really work on it today, but want things tucked away a little bit in case the janitorial staff goes in there to vacuum tomorrow	Vague	108.00	54.00
P. Birk	7/23/2024	0.1	0.1	Researching online to try to find appropriate medical malpractice attorney referrals to offer to Mr. Anthony's father	Vague	108.00	10.80
P. Birk	7/26/2024	0.2	0.2	Attempted callback to caller who left fuzzy voicemail; left a vm with my extension at 2:50	Vague	108.00	21.60
P. Birk	7/26/2024	0.1	0.1	Calling Mr. Lospennato for referral ideas	Vague	108.00	10.80
P. Birk	7/26/2024	0.1	0.1	Attempting callback to caller who left a message last week whose name was unclear; left another voicemail for her to call back	Vague	108.00	200.00
Dalton Courson	12/13/2022	0.5	0.5	conferred with Mr. Pacholke and Ms. Bray regarding same	Vague	400.00	40.00
Dalton Courson	8/10/2023	0.1	0.1	email with Ms. Bray regarding same	Vague	400.00	80.00
Dalton Courson	5/24/2024	0.1	0.1	Conferred with Ms. Bray	Vague	400.00	40.00
Dalton Courson	7/24/2024	0.6	0.6	conferred with Ms. Bray re same	Vague	400.00	240.00
Dalton Courson	7/24/2024	0.3	0.3	zoom meetings with JD	Vague	400.00	120.00
Bruce Hamilton	5/30/2019	5	5	call with Ms. Bray	Vague	400.00	2,000.00
Bruce Hamilton	8/1/2019	2.5	2.5	Meeting	Vague	400.00	1,000.00
Bruce Hamilton	10/5/2020	0.23	0.23	Discussion with Melanie Bray	Vague	400.00	92.00
Bruce Hamilton	5/13/2021	0.25	0.25	Debrief with Katie	Vague	400.00	100.00
Katie Schwartzman	7/2/2018	0.2	0.2	Phone call to JT	Vague	400.00	80.00
Katie Schwartzman	7/27/2018	0.2	0.2	call w MT	Vague	400.00	80.00

Detailed Time Entries - Vague Entries

Exhibit 4

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Katie Schwartzman	8/6/2018	0.1	0.1	meeting setting	Vague	400.00	40.00
Katie Schwartzman	8/7/2018	0.6	0.6	prep for travel meeting	Vague	400.00	240.00
Katie Schwartzman	8/7/2018	0.63	0.63	review of letter to McDowell and second rog	Vague	400.00	252.00
Katie Schwartzman	8/7/2018	0.2	0.2	booking travel	Vague	400.00	80.00
Katie Schwartzman	8/22/2018	0.1	0.1	emails w JT	Vague	400.00	40.00
Katie Schwartzman	8/28/2018	1.2	1.2	Meeting of JT and KB	Vague	400.00	480.00
Katie Schwartzman	9/6/2018	1.81	1.81	Call w CH	Vague	400.00	724.00
Katie Schwartzman	9/11/2018	0.2	0.2	call w MB	Vague	400.00	80.00
Katie Schwartzman	9/13/2018	0.2	0.2	call w JT	Vague	400.00	80.00
Katie Schwartzman	9/17/2018	0.8	0.8	call w KRQ	Vague	400.00	320.00
Katie Schwartzman	9/24/2018	0.5	0.5	Meeting w JT re day's meetings	Vague	400.00	200.00
Katie Schwartzman	9/25/2018	0.6	0.6	Debrief and next steps w JT	Vague	400.00	240.00
Katie Schwartzman	10/1/2018	0.2	0.2	call to MB and JT re calling KF	Vague	400.00	80.00
Katie Schwartzman	10/3/2018	0.7	0.7	call w AC	Vague	400.00	280.00
Katie Schwartzman	10/12/2018	0.41	0.41	call w C. Rodriguez	Vague	400.00	164.00
Katie Schwartzman	10/16/2018	0.6	0.6	call w MB	Vague	400.00	240.00
Katie Schwartzman	10/24/2018	0.3	0.3	emails	Vague	400.00	120.00
Katie Schwartzman	10/29/2018	0.4	0.4	meeting w JT and SV	Vague	400.00	160.00
Katie Schwartzman	10/30/2018	0.1	0.1	email	Vague	400.00	40.00
Katie Schwartzman	10/30/2018	0.1	0.1	emailing team	Vague	400.00	40.00
Katie Schwartzman	10/30/2018	1	1	meeting with AC board member	Vague	400.00	400.00
Katie Schwartzman	10/31/2018	0.38	0.38	call from JT	Vague	400.00	152.00
Katie Schwartzman	11/1/2018	0.88	0.88	PC, memo to file re same	Vague	400.00	352.00
Katie Schwartzman	11/2/2018	0.4	0.4	Call w CR from AC	Vague	400.00	160.00
Katie Schwartzman	2/7/2019	0.8	0.8	call re court's order	Vague	400.00	320.00
Katie Schwartzman	2/11/2019	0.3	0.3	Call to KB, convo w JT/BH/MB	Vague	400.00	120.00
Katie Schwartzman	2/21/2019	2	2	Meeting w JT	Vague	400.00	800.00
Katie Schwartzman	3/14/2019	0.31	0.31	Call from attorney re client	Vague	400.00	124.00
Katie Schwartzman	5/16/2019	2.26	2.26	Meeting	Vague	400.00	904.00
Katie Schwartzman	6/4/2019	1	1	lunch meeting on break	Vague	400.00	400.00
Katie Schwartzman	6/19/2019	0.7	0.7	correspondence in lieu of weekly meeting	Vague	400.00	280.00
Katie Schwartzman	7/2/2019	0.8	0.8	call w JT	Vague	400.00	320.00
Katie Schwartzman	7/11/2019	8.28	8.28	Consultation mtg	Vague	400.00	3,312.00
Katie Schwartzman	8/2/2019	0.11	0.11	review of memo	Vague	400.00	44.00
Katie Schwartzman	9/18/2019	0.5	0.5	meeting w MB and JT	Vague	400.00	200.00
Katie Schwartzman	9/27/2019	0.35	0.35	call w JT and MB	Vague	400.00	140.00
Katie Schwartzman	11/21/2019	3.1	3.1	Internal meeting	Vague	400.00	1,240.00
Katie Schwartzman	12/2/2019	1.1	1.1	Prep meeting for tomorrow	Vague	400.00	440.00
Katie Schwartzman	1/2/2020	0.7	0.7	call w JT re to docs	Vague	400.00	280.00
Katie Schwartzman	2/3/2020	0.2	0.2	Call w MB	Vague	400.00	80.00
Katie Schwartzman	2/26/2020	0.05	0.05	Call to lawyer	Vague	400.00	20.00
Katie Schwartzman	7/1/2020	1	1	Call with Jon & MB	Vague	400.00	400.00
Katie Schwartzman	9/15/2020	0.1	0.1	email re dropbox files	Vague	400.00	40.00
Katie Schwartzman	1/10/2021	2.9	2.9	review of report	Vague	400.00	1,160.00
Katie Schwartzman	1/10/2021	2.77	2.77	review of report	Vague	400.00	1,108.00
Katie Schwartzman	1/10/2020	0.3	0.3	research	Vague	400.00	120.00
Katie Schwartzman	1/11/2021	0.4	0.4	calls w MB and ED	Vague	400.00	160.00
Katie Schwartzman	1/21/2021	0.2	0.2	email to KF	Vague	400.00	80.00
Katie Schwartzman	2/1/2021	0.1	0.1	Email to MB	Vague	400.00	40.00
Katie Schwartzman	2/24/2021	1.8	1.8	research, circulated	Vague	400.00	720.00
Katie Schwartzman	3/4/2021	0.1	0.1	team email	Vague	400.00	40.00
Katie Schwartzman	3/4/2021	0.2	0.2	team email	Vague	400.00	80.00
Katie Schwartzman	3/10/2021	0.2	0.2	team email	Vague	400.00	80.00
Katie Schwartzman	3/23/2021	0.1	0.1	team email	Vague	400.00	40.00

Detailed Time Entries - Vague Entries

Exhibit 4

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Katie Schwartzman	3/29/2021	0.9	0.9	fact research, email to team re same	Vague	400.00	360.00
Katie Schwartzman	4/6/2021	0.1	0.1	Email from MB	Vague	400.00	40.00
Katie Schwartzman	4/8/2021	0	0	team email	Vague	400.00	-
Katie Schwartzman	4/9/2021	0.8	0.8	Team phone call	Vague	400.00	320.00
Katie Schwartzman	4/15/2021	0.3	0.3	team communication	Vague	400.00	120.00
Katie Schwartzman	6/16/2021	0.5	0.5	Call w MB and JT	Vague	400.00	200.00
Katie Schwartzman	7/7/2021	0.7	0.7	team email	Vague	400.00	280.00
Katie Schwartzman	7/7/2021	1	1	Call with Emma, MB, JT	Vague	400.00	400.00
Katie Schwartzman	7/22/2021	0.7	0.7	Meeting w ED, JT	Vague	400.00	280.00
Katie Schwartzman	7/26/2021	2.6	2.6	brief edits	Vague	400.00	1,040.00
Katie Schwartzman	7/27/2021	0.4	0.4	Call, memo and emails to ED re same	Vague	400.00	160.00
Katie Schwartzman	6/25/2022	0.2	0.2	email review	Vague	400.00	80.00
Elena Malik	1/6/2022	1.50	1.50	David Wade Exam Workshop	Vague	250.00	375.00
Nishi Kumar	Not Provided	1.00	1.00	Call with Emma	Vague	300.00	300.00
Bruce Hamilton	Not Provided	2.48	2.48	Project Managemet Opposition	Vague	400.00	992.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Comms	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Comms	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	Meet with Emma	Vague	300.00	300.00
Nishi Kumar	Not Provided	0.50	0.50	Rebecca Check In	Vague	300.00	150.00
Nishi Kumar	Not Provided	1.00	1.00	Civil Lit Check In	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	Check in with Sammy	Vague	300.00	300.00
Total		<u>166.40</u>					\$ 54,722.90
Less N.Kumar Fees							1,950.00
Less half-hour increments							17,437.00
							<u>\$ 35,335.90</u>

EXHIBIT 5

Detailed Time Entries - Time Entries of Ten Hours or More

Exhibit 5

Staff	Date	Time Worked	Time Requested	Activity	Category	Detailed	Attorney Rate	Total
Dalton Courson	6/27/2022	10.00	10.00	Site visit with experts (including travel from Ruston to David Wade)	DWCC Visits	Block Billing	400.00	4,000.00
Dalton Courson	6/28/2022	10.00	10.00	Site visit with experts (including travel from Ruston to David Wade)	DWCC Visits	Block Billing	400.00	4,000.00
Dalton Courson	6/30/2022	10.00	10.00	Client interviews at David Wade (including travel from Ruston to David Wade)	DWCC Visits	Block Billing	400.00	4,000.00
Dalton Courson	3/30/2023	10.00	10.00	Drafting post-trial brief	Post Trial	Drafting Brief	400.00	4,000.00
E. Douglas	12/12/2021	10.00	10.00	Drafting FFCL	FFCL	Drafting	250.00	2,500.00
				Working on drafting lines of questioning for witnesses at trial and the pretrial		Witness		
E. Douglas	12/19/2021	10.00	10.00	FFCL (10)	FFCL	Questions - Drafting	250.00	2,500.00
E. Douglas	1/1/2022	10.00	10.00	Document review - Drafting questions for direct and cross	Trial Preparation	Trial Questions - Drafting	250.00	2,500.00
E. Douglas	3/8/2022	10.00	10.00	Drafting FFCL	FFCL	Drafting	250.00	2,500.00
					Unusual Occurrence			
E. Mueller	7/15/2022	10.00	10.00	DWCC RFP 3R UOR Edit spreadsheet for expert discovery purposes.	Report	Editing	225.00	2,250.00
						DWCC Matters - Record Review		
E. Mueller	10/18/2022	10.00	10.00	DWCC Doc Review-Indiv records	DWCC Doc Review	Record Review	225.00	2,250.00
J. Trunnell	10/23/2019	10.00	10.00	Site inspection	DWCC Visits	Site Inspection	300.00	3,000.00
J. Trunnell	5/25/2021	10.00	10.00	Mediation, arrived 8:30, departed 6:30. Caucus at lunch.	Settlement Conference	Mediation	300.00	3,000.00
				law student prep, meeting w ED, edits to lines of questioning and oral				
Katie Schwartzmann	1/7/2022	10.00	10.00	presentations	Block Billing	Block Billing	400.00	4,000.00
					Motion for Summary			
J. Trunnell	7/6/2021	10.10	10.10	ADA opposition drafting.	Judgement - ADA & RA	Drafting Opposition	300.00	3,030.00
						DWCC Matters - Document Review		
M. Bray	2/9/2019	10.20	10.20	DWCC Doc Review	DWCC Doc Review	Review	300.00	3,060.00
					Appeal of Class			
Robert Cobbs	10/9/2021	10.25	10.25	Research and draft opposition to Defendants' petition for appeal.	Certification	Legal Research	350.00	3,587.50
				Drafting Motions and PO for Motions in Limine, conversations with team re:		Drafting - Motion		
E. Douglas	11/19/2021	10.40	10.40	MIL Finalizing MIL and filing	Motion in Limine	Motion	250.00	2,600.00
Dalton Courson	3/28/2023	10.50	10.50	Drafting post-trial brief	Post Trial	Drafting Brief	400.00	4,200.00
E. Douglas	3/11/2022	10.50	10.50	Drafting FFCL	FFCL	Drafting	250.00	2,625.00
E. Douglas	3/12/2022	10.50	10.50	Drafting FFCL	FFCL	Drafting	250.00	2,625.00
						Motion for Class		
J. Trunnell	12/31/2017	10.50	10.50	MISO Class Cert Drafted and circulated to group	Certification	Certification	300.00	3,150.00
J. Trunnell	3/11/2022	10.50	10.50	FFCL	FFCL	Editing	300.00	3,150.00
				Drove up to EHCC with Jon and Bruce to prepare our clients for depositions this				
M. Bray	2/17/2020	10.50	10.50	week	EHCC Visits - Travel	Travel	300.00	3,150.00
				Travel to DWCC, interviews with PI hearing witnesses and other putative class				
Sarah Hall (Voigt)	6/26/2018	10.50	10.50	members. Revise direct exam following interviews.	Preliminary Injunction	Block Billing	400.00	4,200.00
						Document Review		
E. Mueller	5/12/2022	10.60	10.60	Doc Review - Finished Def Supp 3: RFP 7 & 10 and RFP 18	RFP	Review	225.00	2,385.00
						Trial Questions - Drafting		
M. Bray	1/16/2022	10.60	10.60	Reviewing documents. Drafting and revising questions for Seal and Haney	Working with Experts	Drafting	300.00	3,180.00
					Deposition - Preparation			
J. Trunnell	12/8/2019	10.80	10.80	Deposition Preparation and document review.	Deposition - Preparation	Block Billing	300.00	3,240.00
					Deposition - Preparation			
J. Trunnell	8/8/2020	10.80	10.80	Preparation for depositions.	Preparation	Preparation	300.00	3,240.00
M. Bray	6/26/2018	10.80	10.80	Drove to DWCC, interviews all day, drove back to hotel	DWCC Visits	Block Billing	300.00	3,240.00
						Trial Questions - Drafting		
M. Bray	1/17/2022	10.90	10.90	Reviewing documents. Drafting and revising questions for Seal and Haney	Working with Experts	Drafting	300.00	3,270.00
				fees reasonableness review, redaction fo privileged material, deletion of dups and	Motion for Attorney			
Katie Schwartzmann	8/15/2024	11.00	11.00	admin errors, PCs to MB re sa	Fees	Review	400.00	4,400.00
						Administrative Tasks		
M. Bray	9/7/2020	11.00	11.00	Reorganizing files for experts	Working with Experts	Tasks	300.00	3,300.00
						Trial Questions - Drafting		
M. Bray	1/8/2022	11.00	11.00	Drafting questions for trial, preparing for trial	Trial Preparation	Drafting	300.00	3,300.00
						Debrief - Drafting		
P. Birk	3/30/2023	11.00	11.00	Assisting with posttrial brief drafting (11.0)	Post Trial Brief	Drafting	108.00	1,188.00
Sarah Hall (Voigt)	6/27/2018	11.00	11.00	Preparation for witness interviews and for PI Hearing	Preliminary Injunction	Block Billing	400.00	4,400.00
					Deposition - Preparation			
Katie Schwartzmann	12/11/2019	11.18	11.18	Editing questions for Sherman's depo, drive to depo, took depo, drive home	Preparation - Complaint	Block Billing	400.00	4,472.00
J. Trunnell	7/16/2017	11.20	11.20	Draft received back with comments. New version significantly reorganized	Complaint	Reviewing	300.00	3,360.00
					Deposition - Preparation			
Katie Schwartzmann	3/26/2019	11.20	11.20	Prep for depo, incl. policy review and question mapping	Preparation	Preparation	400.00	4,480.00
J. Trunnell	1/7/2018	11.30	11.30	Revisions to Complaint	Complaint	Editing	300.00	3,390.00
E. Douglas	12/10/2021	11.50	11.50	Drafting FFCL	FFCL	Drafting	250.00	2,875.00
						Trial Questions - Drafting		
M. Bray	1/30/2022	11.50	11.50	Drafting questions for Thompson cross	Working with Experts	Drafting	300.00	3,450.00
						Debrief - Drafting		
P. Birk	3/31/2023	11.50	11.50	Assisting with posttrial brief drafting (11.5)	Post Trial Brief	Drafting	108.00	1,242.00
						Hearing		
Sarah Hall (Voigt)	6/27/2018	11.50	11.50	Continue prep for PI Hearing	Preliminary Injunction	Preparation	400.00	4,600.00
						Hearing		
J. Trunnell	6/27/2018	11.80	11.80	Preparation for hearing.	Preliminary Injunction	Preparation	300.00	3,540.00

Detailed Time Entries - Time Entries of Ten Hours or More

Exhibit 5

Staff	Date	Time Worked	Time Requested	Activity	Category	Detailed	Attorney Rate	Total
M. Bray	1/15/2022	11.80	11.80	Reviewing documents, drafting and revising questions for Seal and Haney	Working with Experts	Trial Questions - Drafting	300.00	3,540.00
P. Birk	2/16/2023	11.80	11.80	Relabelling exhibits to reflect PR designations, extracting only admitted pages from exhibits and saving separately, redacting documents to protect confidentiality of men we don't have releases from	Trial Exhibits	Administrative Tasks - Labeling	108.00	1,274.40
M. Bray	6/27/2018	11.90	11.90	Preparing for PI hearing	Preliminary Injunction	Preparation	300.00	3,570.00
M. Bray	1/14/2022	11.90	11.90	Drafting and revising questions for Seal	Working with Experts	Trial Questions - Drafting Witness Outlines - Drafting	300.00	3,570.00
Dalton Courson	1/14/2023	12.00	12.00	Remedy Trial Preparations, including drafting witness outlines	Trial Preparation	Drafting	400.00	4,800.00
Dalton Courson	3/16/2023	12.00	12.00	Drafting post-trial memorandum	Post Trial	Drafting Memo	400.00	4,800.00
Dalton Courson	3/29/2023	12.00	12.00	Drafting post-trial brief	Post Trial	Drafting Brief	400.00	4,800.00
E. Mueller	5/10/2022	12.00	12.00	Doct review. Phase II: Color coding and RFP 7 and 10 started.	RFP	Document Review	225.00	2,700.00
E. Mueller	5/24/2022	12.00	12.00	Remedy Phase II - View & transcribe body camera footage.	Case Matters	Camera Footage Transcription	225.00	2,700.00
Katie Schwartzmann	7/9/2021	12.00	12.00	review and insertion of client depositions into Opp to Def's 8th A MSJ	Motion for Summary Judgement	MSJ - Review	400.00	4,800.00
J. Trunnell	7/7/2021	12.20	12.20	ADA brief drafting.	RA	Drafting Brief	300.00	3,660.00
E. Douglas	3/9/2022	12.30	12.30	Drafting FFCL	FFCL	Drafting	250.00	3,075.00
M. Bray	1/29/2022	12.30	12.30	Drafting questions for Thompson cross	Working with Experts	Trial Questions - Drafting	300.00	3,690.00
J. Trunnell	2/15/2018	12.70	12.70	Responding to edits on MISO Class Cert.	Motion for Class Certification	Correspondence - No Context Document	300.00	3,810.00
E. Douglas	2/17/2021	12.80	12.80	Document Review	DWCC Doc Review	Review	250.00	3,200.00
E. Douglas	1/15/2022	13.00	13.00	Drafting direct and cross questions preparing for the next week of trial. Organizing evidence, getting exhibits ready	Trial Preparation	Trial Preparation	250.00	3,250.00
J. Trunnell	7/8/2021	13.20	13.20	ADA section drafting	Motion for Summary Judgement - ADA & RA	Drafting	300.00	3,960.00
J. Trunnell	11/19/2021	13.20	13.20	Finalizing and submitting motions in limine, exhibits thereto.	Motion in Limine	Finalization - Motion	300.00	3,960.00
E. Douglas	7/10/2021	13.40	13.40	Working on MSJ for 8th A	Motion for Summary Judgement	MSJ - Drafting	250.00	3,350.00
J. Trunnell	8/9/2020	13.40	13.40	Preparation for depositions.	Deposition - Preparation	Preparation	300.00	4,020.00
E. Douglas	3/14/2022	13.50	13.50	Drafting FFCL	FFCL	Drafting	250.00	3,375.00
M. Bray	1/23/2022	13.80	13.80	Revising line of questions for Goodwin and Haney	Working with Experts	Trial Questions - Editing Document	300.00	4,140.00
E. Mueller	5/11/2022	14.00	14.00	Doct review - Data entry -Phase II - Finished Supp Def 2 of both RFP 7 and 10 and started Supp Def 3 for RFP 10.	RFP	Review	225.00	3,150.00
E. Douglas	3/13/2022	14.50	14.50	Drafting FFCL	FFCL	Drafting	250.00	3,625.00
J. Trunnell	3/13/2022	14.50	14.50	FFCL, live edits and additional facts pulled for summaries.	FFCL	Editing	300.00	4,350.00
Dalton Courson	1/15/2023	15.00	15.00	Drafting witness outlines and preparing for Remedy Phase trial	Trial Preparation	Witness Outlines - Drafting	400.00	6,000.00
Katie Schwartzmann	1/13/2022	15.00	15.00	trial, preparation for next day-- Norris, Pitts, Adams, McDowell, Baird	Trial Preparation	Trial & Trial Prep	400.00	6,000.00
M. Bray	3/13/2019	15.00	15.00	Visits at DWCC and travel back to New Orleans	DWCC Visits - Travel	Block Billing	300.00	4,500.00
J. Trunnell	7/9/2021	15.20	15.20	ADA section finalizing and filing.	Motion for Summary Judgement - ADA & RA	Finalizing	300.00	4,560.00
J. Trunnell	11/30/2019	15.80	15.80	Printing and organizing deposition materials	Deposition - Preparation	Administrative Tasks	300.00	4,740.00
Dalton Courson	1/16/2023	16.00	16.00	Drafting witness outlines and preparing for first day of Remedy Phase trial	Trial Preparation	Witness Outlines - Drafting	400.00	6,400.00
J. Trunnell	3/14/2022	16.10	16.10	Finalizing and last-minute additions to FFCL.	FFCL	Editing	300.00	4,830.00
J. Trunnell	7/12/2021	16.20	16.20	Finalizing 8A MSJ opposition brief for filing.	Motion for Summary Judgement - Eighth Amendment	MSJ - Drafting	300.00	4,860.00
Katie Schwartzmann	7/11/2021	17.00	17.00	Editing MSJ opposition	Motion for Summary Judgement	MSJ - Drafting	400.00	6,800.00
M. Bray	7/12/2021	17.50	17.50	Revising reply to MSJ 8th Amend for DWCC, pulling documents and cites. Made several attempts to file the MSJ, got the main pleading and 10 exhibits filed. ECF is no longer responding, I will need to contact the help desk when they open.	Motion for Summary Judgement	Block Billing	300.00	5,250.00
Katie Schwartzmann	7/12/2021	21.00	21.00	Edits to MSJ opp., research re same	Motion for Summary Judgement	MSJ - Drafting	400.00	8,400.00
		Total	964.63					
								295,938.90
								Less half-hour increments 178,055.00
								Adjusted 10 Hour Plus Time Entries \$ 117,883.90

EXHIBIT 6

Detailed Time Entries - Nishi Kumar

Exhibit 6

Staff	Date	Time Worked	Time Requested	Activity	Category	Attorney Rate	Total
Nishi Kumar	Not Provided	1.00	1.00	Call with Emma	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Class Cert Review	Motion for	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade co-counsel agreement review and	Case	300.00	300.00
Nishi Kumar	Not Provided	0.75	0.75	Comms re DW cocounsel agreement	Case	300.00	225.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade team call	Case	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade logistics and comms	Case	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	DW cocounsel comms	Case	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade witness logistics	Trial	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Comms	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Comms	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	Meet with Emma	Call/Discussion -	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade witness logistics	Working with	300.00	300.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade Witness Prep	Working with	300.00	600.00
Nishi Kumar	Not Provided	0.50	0.50	Send ACA docs	Case	300.00	150.00
Nishi Kumar	Not Provided	0.50	0.50	Rebecca Check In	Vague	300.00	150.00
Nishi Kumar	Not Provided	0.75	0.75	David Wade meeting	Trial	300.00	225.00
Nishi Kumar	Not Provided	1.75	1.75	David Wade witness prep allocations	Working with	300.00	525.00
Nishi Kumar	Not Provided	1.50	1.50	David Wade witness prep allocations	Working with	300.00	450.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade meeting	Case	300.00	300.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade Witness Prep	Working with	300.00	600.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade witness prep allocations	Working with	300.00	300.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade team meeting	Case	300.00	600.00
Nishi Kumar	Not Provided	1.00	1.00	Civil Lit Check In	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade witness prep allocations	Working with	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade team meeting	Case	300.00	300.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade witness meeting	Working with	300.00	600.00
Nishi Kumar	Not Provided	1.00	1.00	Check in with Sammy	Vague	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade witness meeting	Working with	300.00	300.00
Nishi Kumar	Not Provided	2.00	2.00	Witness Brainstorm	Working with	300.00	600.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade Witness Prep	Working with	300.00	600.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade visit logistics	DWCC Visits	300.00	300.00
Nishi Kumar	Not Provided	2.00	2.00	Depo Prep Training	Deposition -	300.00	600.00
Nishi Kumar	Not Provided	7.00	7.00	David Wade Depo Prep Trip	DWCC Visits	300.00	2,100.00
Nishi Kumar	Not Provided	3.50	3.50	Depo prep	Deposition -	300.00	1,050.00
Nishi Kumar	Not Provided	6.00	6.00	David Wade Depo Prep Trip	DWCC Visits	300.00	1,800.00
Nishi Kumar	Not Provided	6.00	6.00	David Wade Depo	Deposition	300.00	1,800.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade meeting and pre-trial conference	Joint Pre Trial	300.00	600.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade meeting and pre-trial conference	Joint Pre Trial	300.00	300.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Depo	Deposition	300.00	300.00
Nishi Kumar	Not Provided	4.00	4.00	Review depo testimony for redactions	Depositions	300.00	1,200.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade witness interview and exam draft	Working with	300.00	600.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade witness interview and exam draft	Working with	300.00	600.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade Witness prep	Working with	300.00	600.00
Nishi Kumar	Not Provided	2.00	2.00	David Wade Witness prep	Working with	300.00	600.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade Witness prep	Working with	300.00	2,700.00
Nishi Kumar	Not Provided	4.00	4.00	David Wade Witness prep	Working with	300.00	1,200.00
Nishi Kumar	Not Provided	4.00	4.00	David Wade Witness training and prep	Working with	300.00	1,200.00
Nishi Kumar	Not Provided	4.00	4.00	David Wade Witness training and prep	Working with	300.00	1,200.00
Nishi Kumar	Not Provided	4.50	4.50	David Wade Witness training and prep	Working with	300.00	1,350.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade team meeting	Case	300.00	300.00
Nishi Kumar	Not Provided	5.00	5.00	David Wade prep and trainings	Trial Preparation	300.00	1,500.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Witness training and prep	Working with	300.00	300.00
Nishi Kumar	Not Provided	1.25	1.25	David Wade prep and trainings	Trial Preparation	300.00	375.00
Nishi Kumar	Not Provided	1.00	1.00	David Wade Witness training and prep	Working with	300.00	300.00
Nishi Kumar	Not Provided	7.00	7.00	David Wade Witness prep	Working with	300.00	2,100.00
Nishi Kumar	Not Provided	5.00	5.00	David Wade Witness prep	Working with	300.00	1,500.00
Nishi Kumar	Not Provided	10.00	10.00	David Wade trial	Trial	300.00	3,000.00
Nishi Kumar	Not Provided	7.50	7.50	David Wade trial	Trial	300.00	2,250.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	7.00	7.00	David Wade trial	Trial	300.00	2,100.00
Nishi Kumar	Not Provided	5.50	5.50	David Wade trial	Trial	300.00	1,650.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.00	9.00	David Wade trial	Trial	300.00	2,700.00
Nishi Kumar	Not Provided	9.50	9.50	David Wade trial	Trial	300.00	2,850.00
Nishi Kumar	Not Provided	9.50	9.50	David Wade trial	Trial	300.00	2,850.00

Total 290.00

Hours Worked 87,000.00

Reduction 18,960.00

Total Requested Fees \$ 68,040.00

EXHIBIT 7

Exhibit 7

Hours and Fees Sought As Reflected in Declaration Statements

Description		Hours	Amount	Notes
1	Pre- Complaint Investigation	1,113.78	375,632.00	Time incurred prior to the filing of the initial Complaint, TRO motion, Class Certification Motion that was not directly related to drafting, filing or legal research associated with filing of these
2	Administrative Remedy Procedure	25.80	7,740.00	Time spent on affidavits throughout the litigation.
3	Affidavits	16.70	5,001.60	Time attending, researching and traveling to a trial regarding prisoner rights at Angola.
4	Angola Trial Attendance & Research	20.00	7,950.00	Time spent appealing Magistrate decisions or responding to appeals of Magistrate decisions.
5	Appeal - Magistrate	92.43	31,304.50	Time spent on research, drafting, reviewing, filing replies or briefs or any other time working on the appeal of the class certification.
6	Appeal of Class Certification	38.95	12,667.50	These are entries wherein several tasks were identified without attributing specific time to each task.
7	Block Billing	107.91	33,805.40	Time spent memorializing various phone calls, primarily with clients.
8	Call Memo	43.30	8,216.00	Time spent on emails, calls or other written correspondence with opposing counsel.
9	Correspondence/Call- Opposing Counsel	55.83	17,712.80	Time spent discussing or meeting about the case with various members of the legal team. These do not include entries that were specifically related to weekly or other team meetings.
10	Call/Discussion/Meeting - Co-Counsel	121.96	38,809.70	Time spent supervising staff; hiring experts, document management, technology issues, hiring staff, training interns, drafting and executing personal service agreements, hiring and working with temps and creating work plans.
11	Case Management	777.71	223,297.20	Time spent on various aspects of the case that were not directly related to specific motions or filings.
12	Case Matters	393.31	110,985.11	Time spent on calls with class members, their relatives or friends.
13	Client Communications	348.88	76,819.97	Time spent on processing class members as clients.
14	Client Intake	178.28	24,902.33	Time spent reading and responding to letters received from class members.
15	Client Letters	51.92	10,897.80	Time spent dealing with specific issues associated with class members.
16	Client Matters	42.75	14,986.40	Time spent meeting with class members that was not specified in the time entry description as occurring at DWCC or other correctional facilities.
17	Client Meetings	77.04	27,934.93	Time spent drafting, filing, reviewing and conducting research on the original complaint and subsequent amendments to the complaint.
18	Complaint	532.64	170,336.00	Time spent creating and maintaining a database of class members.
19	Database	20.40	7,520.00	This includes all time to travel, prepare and meet with class members or DCI officials.
20	DCI Visits	5.40	1,620.00	This includes time to prepare and travel to depositions as well as actual time in the deposition.
21	Depositions	2,888.06	936,874.53	This includes all time spent on interrogatories, requests for production, requests for admissions, meet and confer meetings and processing the receipt of discovery.
22	Discovery	1,428.96	420,871.40	Time to travel, prepare and meet with class members or DWCC officials.
23	DWCC Doc Review	1,221.58	358,479.50	Time to travel, prepare and meet with class members or EHCC officials.
24	DWCC Visits	1,621.18	516,860.35	Time researching, drafting, reviewing and filing FFCL briefs.
25	EHCC Visits	109.99	34,373.67	This includes research and investigations other than legal research. This includes time investigating the death of a prisoner, disbursements of prescriptions, use of force, unusual occurrence reports and
26	Findings of Facts and Conclusions of Law	435.50	121,885.00	These were entries that were cut off when copied over into schedules supporting the Motion for Attorney Fees.
27	General Case Research/Investigation	223.83	69,282.00	Time spent preparing, drafting and sending initial disclosures.
28	Incomplete time entry	169.44	67,706.00	Time spent processing and responding to inmate and intake letters.
29	Initial Disclosures	18.10	5,430.00	This is legal research that was not directly related to a specific motion or filing.
30	Inmate Letters/Intake Letters/Inmate Response Letter	1,375.73	178,318.80	This includes time spent preparing and sending mass mailings to class members. It appears the
31	Legal Research	122.32	39,465.00	Plaintiffs processed the mailings themselves rather than use a mass mailing company.
32	Mass Mailings	350.50	45,111.00	Time spent at the mediation, preparing for the mediation and traveling to the mediation.
33	Mediation	84.80	28,000.00	Time spent on timesheets, expense sheets, reviewing and redacting time sheets, preparing, drafting
34	Motion for Attorney Fees/Costs	233.05	72,905.80	and filing.

Exhibit 7

Hours and Fees Sought As Reflected in Declaration Statements

Description	Hours	Amount	Notes
35 Motion for Class Certification	412.58	132,899.50	Time spent on research, preparation, drafting, filing and reviewing motion.
36 Motion for Contempt	24.00	7,480.00	Time spent on research, preparation, drafting, filing and reviewing motion.
37 Motions for Leave	38.84	12,384.80	Time spent on research, preparation, drafting, filing and reviewing various motions to leave.
38 Motion for Mental Exams	55.25	17,700.00	Time spent on research, preparation, drafting, filing and reviewing motion.
39 Motion for Protective Order	268.21	94,539.00	Time spent on research, preparation, drafting, filing and reviewing motion.
40 Motion for Sanctions	29.21	9,894.00	Time spent on research, preparation, drafting, filing and reviewing motion.
41 Motion for Spoliation	66.10	19,630.00	Time spent on research, preparation, drafting, filing and reviewing motion.
42 Motion for Summary Judgement	543.70	165,535.00	Time spent on research, preparation, drafting, filing and reviewing motion.
43 Motion in Limine	519.07	163,403.00	Time spent on research, preparation, drafting, filing and reviewing motion and preparing for oral arguments.
44 Motion to Compel	362.28	113,617.00	Time spent on research, preparation, drafting, filing and reviewing motion.
45 Motion to Continue	23.15	7,345.00	Time spent on research, preparation, drafting, filing and reviewing motion.
46 Motion to Reopen Discovery/Record	81.45	24,550.60	Time spent on research, preparation, drafting, filing and reviewing motion.
47 Motion to Strike Affidavits	23.60	7,260.00	Time spent on research, preparation, drafting, filing and reviewing motion.
48 Motion to Strike Jury Demand	19.28	6,062.00	Time spent on research, preparation, drafting, filing and reviewing motion.
49 Motion to Supplement	53.39	16,583.20	Time spent on research, preparation, drafting, filing and reviewing motion.
50 Motion to Transfer Venue	58.60	18,360.00	Time spent on research, preparation, drafting, filing and reviewing motion.
51 Motions for Access to Class Members	38.76	12,144.00	Time spent on research, preparation, drafting, filing and reviewing motion.
52 Objection to Report & Recommendations	88.86	30,119.00	Time spent on research, preparation, drafting, filing and reviewing objecting.
53 Post Trial	219.42	68,525.20	Time spent on post trial briefs, post trial orders or other post trial work with the exception of the
54 Potential ADA Monitors	7.70	2,174.80	Time spent researching and assessing potential ADA monitors.
55 Preliminary Injunction	320.40	106,490.00	Time spent on research, preparation, drafting, filing and reviewing motion.
56 Pre-Trial Orders/Conferences	191.87	59,041.27	Time spent on research, preparation, drafting, filing and reviewing pre-trial orders and attending pre-trial conferences.
57 Privilege Log	7.92	2,428.00	Time spent creating attorney privilege log.
58 Proposed Consent Decree	20.50	6,150.00	Time spent on research, preparation, drafting, and reviewing consent decrees
59 Public Record Requests	11.80	3,722.00	Time spent preparing and sending out public records
60 Reviewing Court Orders	23.40	7,218.40	Time spent reviewing court orders.
61 Scheduling Conferences/Orders	16.43	5,302.00	Time preparing for and attending scheduling conferences, drafting and reviewing scheduling orders.
62 Settlement Agreement/Conference	156.50	49,570.00	Time spent at the settlement conference, time to prepare for the conference, travel to the conference and time to draft/review the settlement agreement.
63 Status Conference	175.68	54,506.80	Time spent preparing for and attending status conferences and any associated travel.
64 Sur-Reply	41.97	13,582.60	Time spent researching, drafting, reviewing and filing.
65 Team Meetings	926.40	299,512.77	These were weekly and ad hoc team meetings held for the litigation team.
66 Time Entry Issue	81.20	20,300.00	These are entries wherein the time claimed doesn't equal the time claimed in the description.
67 Travel	99.70	29,242.20	These are entries that lack explanation regarding the purpose of the travel.
68 Trial	1,789.43	534,056.68	Time spent at trials.
69 Trial Preparation	1,398.94	423,080.10	Time spent preparing for trial including preparing experts and witness.
70 TRO	222.15	71,760.00	Time spent working on the drafting, filing, review and research for the TRO filed on Feb. 20, 2018.
71 TRO- Second	60.60	19,320.00	Time spent working on the drafting, filing, review and research for the TRO filed on Jan 31, 2019.
72 Vague	166.40	54,722.90	Time entries that provided no description of what was being worked on.
73 Various Motions	135.41	44,901.00	Time spent on motions not previously noted. This includes time to research, prepare various motions.
74 Witness List	12.20	3,720.00	Time spent on witness lists for various hearings.
75 Working with Experts	760.67	231,089.25	Time spent working with experts, not including trial, hearing or deposition preparation.
76 Working with Witnesses	249.58	77,813.26	Time spent working with or identifying witnesses, not including trial, hearing or deposition
77 Writ of Habeas Corpus	18.10	5,520.00	Time spent on research, preparation, drafting, filing and reviewing writ.
Total	24,168.70	7,156,957.62	
Reductions	2,135.10	567,303.32	
Total After	22,033.60	\$6,589,654.30	

EXHIBIT 8

Individual Attorney Requested Hours and Fees by Motion/Pleading

Exhibit 8

Complaint

<u>Attorney</u>	<u>Time</u>	<u>Fee</u>	<u>Notes</u>
J. Trunnell	386.70	116,010	Primary drafter.
Katie Schwartzmann	58.94	23,576	Aided in drafting.
M. Bray	40.50	12,150	Primary reviewer, edited and added to document.
R. Lospennato	36.00	14,400	Review and edits.
Sarah Hall (Voigt)	10.50	4,200	Review and edits.
Total	532.64	\$ 170,336	

Findings of Facts and Conclusion of Law

<u>Attorney</u>	<u>Time</u>	<u>Fee</u>	<u>Notes</u>
Dalton Courson	18.60	7,440	Aided in drafting.
E. Douglas	228.50	57,125	Primary drafter.
J. Trunnell	116.20	34,860	Worked on summaries and charts.
Katie Schwartzmann	8.00	3,200	Review
M. Bray	64.20	19,260	Primary reviewer, edited and added to document.
Total	435.50	\$ 121,885	

Motion for Class Certification

<u>Attorney</u>	<u>Time</u>	<u>Fee</u>	<u>Notes</u>
Bruce Hamilton	1.75	700	Checked citations on brief.
E. Douglas	26.10	6,525	Reviewing and editing brief.
J. Trunnell	181.20	54,360	Drafted initial motion.
Katie Schwartzmann	35.78	14,312	Reviewed class briefs.
M. Bray	43.60	13,080	Review, research and edits to initial motion and briefs.
Nishi Kumar	1.00	300	Review
R. Lospennato	3.90	1,560	Review
Robert Cobbs	112.75	39,463	Drafted supplement brief.
Sarah Hall (Voigt)	6.50	2,600	Class counsel declaration.
Total	167.75	\$ 132,900	

Motion for Summary Judgement

<u>Attorney</u>	<u>Time</u>	<u>Fee</u>	<u>Notes</u>
E. Douglas	105.10	26,275	Drafted ADA and 8th Amendment motions and deposition citations for both motions. Researched and drafted motion on ADA amendment claims, reviewed motion on 8th claims.
J. Trunnell	244.60	73,380	Research and drafted motion on 8th amendment claims, reviewed motion on ADA claims.
Katie Schwartzmann	75.90	30,360	Review and edits Researched and drafted motion on 8th amendment claims, reviewed motion on ADA claims.
M. Bray	117.20	35,160	Review
R. Lospennato	0.90	360	
Total	543.70	\$ 165,535	

Individual Attorney Requested Hours and Fees by Motion/Pleading

Exhibit 8

Motions in Limine			
<u>Attorney</u>	<u>Time</u>	<u>Fee</u>	<u>Notes</u>
Bruce Hamilton	11.81	4,724	Review, attend hearings, participated in moots. Drafted memo for opposition to second motion in
Dalton Courson	47.4	18,960	limine.
E. Douglas	82.9	20,725	Drafted section for one of the experts. Drafted motion in limine, oral arguments, mooted for
J. Trunnell	249.5	74,850	oral arguments.
Katie Schwartzmann	52.66	21,064	Review and edits of motions. Drafted memo for opposition to first motion in limine,
M. Bray	67.1	20,520	mooted for oral arguments.
R. Lospennato	6.4	2,560	Review, attend hearings, participated in moots.
Total	517.77	163,403	

Motions to Compel			
<u>Attorney</u>	<u>Time</u>	<u>Fee</u>	<u>Notes</u>
Bruce Hamilton	1.07	428	Review and edit.
E. Douglas	26.10	6,525	Legal research, sur-reply on motion.
J. Trunnell	165.20	49,560	Motion to compel depositions, reviews and edits of various motions to compel, opposition to 4th motion to
Katie Schwartzmann	39.51	15,804	Review and edits of various motions to compel.
M. Bray	108.60	32,580	Motion to compel depositions, reviews and edits of various motions to compel, opposition to 4th motion to
R. Lospennato	20.80	8,320	Opposition to motion to compel.
Sarah Hall (Voigt)	1.00	400	Review and edit.
Total	362.28	113,617	

Preliminary Injunction			
<u>Attorney</u>	<u>Time</u>	<u>Fee</u>	<u>Notes</u>
Bruce Hamilton	0.34	136	Review and edits.
J. Trunnell	128.60	38,580	Supplemental briefs, argued at hearing, preparation for hearing, working with witnesses for hearing.
Katie Schwartzmann	24.06	9,624	Review and edits of supplemental briefs.
M. Bray	87.60	26,280	Research of video evidence, drafting of motion, attended hearing and participated in hearing prep.
R. Lospennato	22.30	8,920	Attended hearing and participated in hearing prep.
Sarah Hall (Voigt)	57.00	22,950	Attended hearing and participated in hearing prep, aided in drafting of motion and briefs.
Total	319.90	106,490	

APPENDIX A

3850 North Causeway Blvd.,
Two Lakeway Plaza Suite 1400
Metairie, Louisiana 70002
504.585.4410 | Cell: 985.630.2389
Email: mavery@cricpa.com



CURRICULUM VITAE
MICHELE AVERY, CPA/ABV, MBA
CVA, MAFF

POSITION	Forensic and Valuation Services – Partner
EDUCATION	Bachelor of Arts, University of Wisconsin Master of Business Administration, Louisiana State University
PROFESSIONAL CERTIFICATIONS	Certified Public Accountant, Licensed Since 2001 Certified Valuation Analyst, Since 2003 Accredited Business Valuator, Since 2006 Master Analyst in Financial Forensics – Matrimonial Litigation
RANGE OF EXPERIENCE	<p>Expert Reports and Testimony for litigation proceedings that are concerned with lost profits, economic damages, shareholder disputes, marital dissolution proceedings and insurance claims.</p> <p>Business Valuation experience includes extensive valuation work in numerous industries. Her professional experience includes business valuations for estate and gift matters, marital dissolution proceedings, shareholder disputes, buy/sell agreements and management buy outs.</p>
EMPLOYMENT HISTORY	Carr, Riggs & Ingram, LLC... 2024- LaPorte CPA & Business Advisors... 2006-2024 Postlethwaite & Netterville, APAC... 2002-2006 Asco plc... 2000-2002 Halliburton Company... 1998-2000
SELECTED SPEECHES	“Business Valuation 101” <i>American Society of Women Accountants</i> , January 2005 <i>North Shore Estate and Financial Planning Council</i> , July 2009 <i>University of New Orleans CPE Series</i> , August 2009 <i>Construction Financial Management Association</i> , October 2011 <i>Institute of Intensive Internal Audit</i> , April 2011 <i>Tulane University 10th Annual Wealth Management Seminar</i> , May 2011

“Business Valuation in the Healthcare Industry” *Louisiana Hospital Association* Sept. 2011
 “8th Annual Family Wealth Management Seminar” *Business Valuation Expert on Wealth Management Panel, presented by Tulane University* May 2009
 “Valuation Process in Estate Matter” *National Business Institute* July 2011
 “Attorney’s Guide to Financials and Business Valuations” *National Business Institute* May 2013
 “Intro to Business Valuation” *Covington Bar Association* April 2013
 “Accountant’s Guide to Business Succession Planning” *National Business Institute* Oct. 2014
 “Forensic Accounting 101 for Attorneys” *National Business Institute* July 2014, July 2016
 “Buying & Selling a Business: Lessons from a Business Valuation Appraiser” *National Business Institute* Oct. 2017
 “Handling the Sale of a Business” *National Business Institute* November 2015, 2017
 “Key Concepts of Business Value” *New Orleans Bar Association, Aug. 2016, St. Charles Parish Bar Association*, Nov 2017
 “Buying and Selling a Business: Start to Finish, November 2018
 “Earnouts, Contributions, Salaries, Distributions, Price and Payments,” presented at
 Negotiating Indemnification, Reps, Warranties and More in Business Contracts seminar,
 December 2019
 “Case Studies in Business Valuation,” November 19, 2019
 “Creating a Business Succession Plan,” presented at Business Law: Start to Finish
 seminar, July 2019
 “Understanding Quality of Earning Reports” Lorman Educational Services, November
 2024
 “Accounting 101 for Attorneys” *National Business Institute* December 29, 2023, June 25, 2024,
 December 12, 2024

PUBLICATIONS

“The Evolution of the Business Valuation Analyst” Lagniappe, February 2007
 “Business Valuation Standards – One Year Later” Lagniappe, February 2009
 “Business Valuation Basics” *Louisiana Medical Journal*, March 2009
 “Business Valuation- To Discount or Not to Discount” Lagniappe, March 2010 “Do
 “Business Brokers, CPA/ABVs, Venture Capitalists Speak the Same Language”
 Lagniappe March 2012
 “Professional Standards Applicable to Forensic and Valuation Services, Lagniappe July 2012
 “Business Valuation, Divorce & Goodwill – A Louisiana Perspective, Lagniappe Oct. 2013
 “Employee Stock Ownership Plans: Increasing Scrutiny of Valuations, Lagniappe Oct. 2014

EXPERT WITNESS TESTIMONY

I have testified as an expert at trial or by deposition in the following cases:

Claude Lightfoot, Jr., Trustee v.
 L.L. Turner, Inc., a Louisiana Corporation
 United States Bankruptcy Court Case No. 05-14789

Trial Testimony,
 Accounting

Ann Marie Schiffrerstien Moser v.
 Charles Ramous Moser
 24th JDC No. 544-425

Deposition Testimony,
 Business Valuation

Jash Patel, M.D. v. Delta Imaging, L.L.C.
 And Jerry Satterlee, M.D.
 American Arbitration Association
 Case No. 96-193-00260-10

Arbitration Testimony,
 Business Valuation

Patricia M. House v. Res S. Houser 22 nd JDC No. 2006-14836 Div “K”	Trial Testimony, Community Partition
Christopher J. Sacco vs. Karyl Paxton, Pierce Paxton Design Studio, L.L.C., And Karly Paxton Design, Inc. CDC No. 2004-0466 Division “C”	Trial Testimony, Business Valuation
Luke Dean v. Chantana R. Dean 32 nd JDC, No. 160592 Division “C”	Trial Testimony Spousal Support
David J. Vedros v. Kelli Soileau Vedros 24 th JDC, No. 684-047 Division “P”	Trial Testimony, Business Valuation
William Yost, M.D. & Doctors Medical Center Of Picayune, LLC v. Mayor Okoloise, M.D., et al Chancery Court of Pearl River County, MS	Trial Testimony, Business Valuation
PHC Morgan City (Teche Regional) v. Hospital Service District No. 2, Parish of St. Mary 16 th JDC No. 129,459 Division “C”	Hearing Testimony, Accounting
John W. Davis, CPA, LLC v. Family Health Centers, Inc. D/B/A Channell Drugs 21 st JDC No. 2008-0001268	Trial Testimony, Accounting, Business Valuation
William Eckert & Michael Tarleton v. Ungarino & Maldonado, LLC (Formerly Ungarino & Eckert, LLC) Arbitration Cause No. 17C140ARB	Arbitration Testimony, Accounting
Warren J. Deemer & Mary Gilardi Demeer vs. Deutsche National Trust Company, et al. United States District Court for the Eastern District of Louisiana Case No. 2:17-cv-02019, Section G/3.	Deposition Testimony, Accounting
Gulf Engineering v. The Dow Chemical Company US District Court for the Middle District Of Louisiana, Case No 3:15-CV-00441	Trial Testimony, Lost Profits
Barnett v. Barnett 24 th JDC No. 732-788, Division M	Deposition and Trial Testimony, Community Partition
Bergeron v. Jacobson 24 th JDC, No.769-829, Division F	Testimony Special Master Hearing, Business Valuation, Community Partition
Highsmith v Highsmith 24 th JDC, 829-039, Division I	Hearing Testimony, Child Support

Steckel v Bigler, State Farm Mutual, Government
Employees Insurance
24th JDC, Case No: 798-855

Deposition, Personal Injury
Lost Wages, Future Medical

Corey Chaney and Miranda Chaney
vs. First Federal Savings and Loan
Association of Pascagoula-Moss Point
and Gill Construction, Inc
Circuit Court of Jackson, MS
Cause No. 30CI1:20-cv-00015-RK

Deposition Testimony,
Economic Damages

Housing Systems, Inc v Classic Construction of New
Orleans Constance Lofts, LLC, CCNO Constance
Lofts, LLC Richard Mithun, Joseph Stebbins

Deposition Testimony,
Lost Profits

CRC Distributing, LLC v. Phil's Cake Box Bakeries, Inc.,
d/b/a Alessi's Bakeries and Phil Alessi, Jr.

Deposition Testimony,
Lost Profits

Madison Property Group, LLC.,
22nd Judicial District Court for the Parish
of St. Tammany, State of Louisiana,
Case No. 2014-14055, Division "A"

Deposition Testimony, Accounting

Stockton v. Stockton
21st JDC

Trial Testimony, Business Valuation

Fremin v. Fremin
24th JDC

Commissioner Hearing Testimony,
Spousal Support, Business Valuation, Community
Partition

McHughes v. McHughes
21st JDC

Trial Testimony, Business Valuation

Succession of Harold Raymond
Neuburger
24th JDC

Trial Testimony, Accounting

Bullrun Productions,
v. International House, LLC
Civil District Court of Orleans
Parish

Trial Testimony – Lost Profits

APPENDIX B

- Motion for an Award of Attorneys' Fees and Costs filed August 17, 2024.
- Memorandum in Support of Motion for an Award of Attorneys' Fees and Costs
- Exhibits to Motion for an Award of Attorneys' Fees and Costs filed August 17, 2024.
- Supplemental Motion for an Award of Attorneys Fees and Costs filed June 30, 2025.
- Initial Complaint, Motion for Class Certification and Motion for Class Certification filed February 20, 2018 in Tellis et al v. Leblanc et al.
- Various motions in pleadings in the litigation Tellis et al v. Leblanc et al
- Chrastil, Nick. "In first day of civil rights trial, former David Wade prisoners describe years of solitary confinement, filthy living areas and poor mental health care." The Lens, January 11, 2022.
- Chrastil, Nick. "Mental health care at David Wade Correctional Center ruled unconstitutional." The Lens, November 1, 2022.
- Chrastil, Nick. "'Torturous': Judge places solitary confinement and mental health care at David Wade prison under federal oversight." The Lens, July 24, 2024.
- Talammo, Lex. "David Wade prison lawsuits allege brutality, roaches, sexual abuse", Shreveport Times, October 14, 2017.
- Boucher, Makenzie. "Judge Rules Louisiana prison violated rights of inmates", Shreveport Times, November 2, 2022.
- ACLU Press Release : Tellis v. LeBlanc, February 20, 2018.
- Civil Rights Litigation Clearing House. Case: Tellis v LeBlanc Case Summary